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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2008 JUL 1 PM 4 42

**IN THE MATTER OF THE HEARING CALLED BY THE
OIL CONSERVATION DIVISION FOR THE PURPOSES
OF CONSIDERING:**

CASE NO. 14146

**APPLICATION OF WILLIAMS PRODUCTION CO., LLC
FOR PRE-APPROVAL OF DOWNHOLE COMMINGLING
AND FOR NON-STANDARD LOCATIONS IN THE ROSA
UNIT, SAN JUAN AND RIO ARriba COUNTIES,
NEW MEXICO.**

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Williams Production Company
c/o Vern Hansen
One Williams Center
25th Floor
P. O. Box 3102
Tulsa, Oklahoma 74101

ATTORNEY

Ocean Munds-Dry
Holland & Hart LLP
110 N. Guadalupe St. Suite 1
Santa Fe, NM 87501
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STATEMENT OF CASE

APPLICANT

Applicant, in the above-styled cause seeks pre-approval for downhole commingling in the Basin Dakota Pool, Basin Fruitland Coal Gas Pool, Rosa Pictured Cliffs Pool, East Blanco Pictured Cliffs Pool, Carracas-Pictured Cliffs Pool, Blanco Mesaverde Pool, Cottonwood-Fruitland Sand Pool, Laguna Seca Gallup Pool, Cedro Gallup Pool, Willow Gallup Pool and the Basin Mancos Pool. Applicant also seeks non-standard locations for the Rosa Unit in Township 32 North, Range 6 West, Township 31 North, Ranges 4, 5 and 6 West, NMPM, San Juan and Rio Arriba Counties. Said area is located approximately 9 miles southeast of Arboles, Colorado.


PROPOSED EVIDENCE

APPLICANT

WITNESSES	ESTIMATED TIME	EXHIBITS
Vern Hansen, Petroleum Landman	Approx. 30 minutes	Approx. 10
Larry Higgins, Surface and Regulatory Specialist	Approx. 30 minutes	Approx. 10
Ken McQueen, Reservoir Engineer	Approx. 60 minutes	Approx. 20

PROCEDURAL MATTERS

Williams has none at this time.


Ocean Munds-Dry
Attorney for Williams Production Company