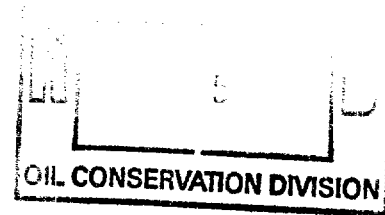


STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



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

CASE NO. 11569

APPLICATION OF RICHARDSON OPERATING COMPANY
FOR COMPULSORY POOLING AND AN UNORTHODOX GAS WELL
LOCATION, SAN JUAN COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by RICHARDSON
OPERATING CO., as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Richardson Operating Co.
1700 Lincoln, Suite 1700
Denver, Colorado 80203
(303) 830-8000
attn: Cathy Colby

ATTORNEY

W. Thomas Kellahin
KELLAHIN AND KELLAHIN
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

STATEMENT OF RICHARDSON OPERATING COMPANY

Richardson has a working interest ownership in the oil and gas minerals underlying the SE/4 of Section 15, T29N, R13W, NMPM, San Juan County, New Mexico.

In order to minimize surface disturbance within the SE/4 of said Section 15, Richardson seeks approval to locate its ROPCO 15 GW PC Well No. 2 at an unorthodox well location for production for the Pictured Cliffs formation.

Richardson has proposed to the other working interest owners that this well be drilled and completed for potential production from any Pictured Cliffs formation to be dedicated to a 160-acre gas spacing and proration unit consisting of the SE/4 of said Section for production from either the Fulcher Kutz-Pictured Cliffs Gas Pool or the West Kutz-Pictured Cliffs Gas Pool.

Despite its good faith efforts, Richardson has been unable to obtain a written voluntary agreement from all of the working interest and or mineral interest owners. Therefore, Richardson needs an order of the Division pooling the identified and described mineral interests in order to protect correlative rights and prevent waste.

PROPOSED EVIDENCE

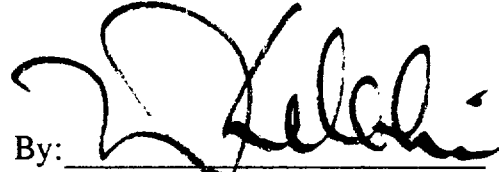
APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Cathy Colby (landman)	20 min.	@ 8 exhibits
Dana Delventhal (petroleum engineer)	30 Min.	@ 6 exhibits

PROCEDURAL MATTERS

None anticipated at this time.

KELLAHIN AND KELLAHIN



By: _____
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