

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

**APPLICATION OF RICHARDSON PRODUCTION  
COMPANY FOR COMPULSORY POOLING, SAN  
JUAN COUNTY, NEW MEXICO.**

**CASE NO. 12798**

**APPLICANT'S PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by applicant pursuant to the rules of the Oil  
Conservation Division.

**APPEARANCES**

**APPLICANT**

Richardson Production Company  
Attention: Rebecca VanBlaricom  
1700 Lincoln, Suite 1700  
Denver, Colorado 80203  
(303) 830.8000

**ATTORNEY**

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**OPPONENT**

None.

**OPPONENT'S ATTORNEY**

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**APPLICANT'S STATEMENT OF ITS CASE**

Richardson Production Company ("Richardson") seeks an order pooling all mineral interests in the Pictured Cliffs formation underlying the SE/4 of Section 17, Township 29 North, Range 13 West, to form a standard 160-acre spacing and proration unit for Richardson's proposed RPC "17" Well No. 4 to be located at an unorthodox gas well location in Unit O of Section 17 for production from the Pictured Cliffs formation. Also to be considered will be the costs of participation in the well, including but not limited to the costs of drilling, completing and equipping, with inclusion of a risk factor penalty and the allocation of costs and income therefor as well as actual operating costs and charges for supervision. It is requested that Richardson Operating Company be designated operator of the proposed well, which is located approximately 1-1/4 miles west from the Center of the City of Farmington, New Mexico.

**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESSES</b> <b>(Name and expertise)</b>	<b>EST. TIME</b>	<b>EXHIBITS</b>
Rebecca VanBlaricom (Landman)	15 Minutes	Approximately 5
David Richardson (Geologist)	10 Minutes	Approximately 4

**PROCEDURAL MATTERS**

None.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

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Attorneys for RICHARDSON  
PRODUCTION COMPANY