

**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. 12813**

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

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by RICHARDSON PRODUCTION COMPANY, 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: Rebecca E. Van Blaricom

**ATTORNEY**

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

## STATEMENT OF RICHARDSON PRODUCTION COMPANY

Richardson has a working interest ownership in the oil and gas minerals underlying the E/2 of Section 7, T29N, R14W, NMPM, San Juan County, New Mexico.

Richardson has proposed to the other interest owners that this well be drilled for downhole commingled production from any Pictured Cliffs formation to be dedicated to a 160-acre gas spacing and proration unit consisting of the NE/4 of Section 7 for this production and the E/2 for any production from the Basin Fruitland Coal Gas Pool to be dedicated to a 300-acre gas spacing and proration unit consisting of the E/2 of Section 7 for production.

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


Rebecca E. Van Blaricom (landman) 15 min. @ 8 exhibits

David Richardson (geologist) 15 Min. @ 3 exhibits

### PROCEDURAL MATTERS

None anticipated at this time.

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