

BEFORE THE OIL & GAS CONSERVATION COMMISSION
OF THE STATE OF COLORADO

IN THE MATTER OF THE APPLICATION OF WILLIAMS
PRODUCTION RMT COMPANY FOR AN ORDER
POOLING ALL NON-CONSENTING INTERESTS IN THE
WILLIAMS FORK FORMATION IN AN ESTABLISHED
DRILLING AND SPACING UNIT LOCATED IN THE
GRAND VALLEY FIELD, GARFIELD COUNTY,
COLORADO

CAUSE NO: 510

DOCKET NO: _____

APPLICATION

COMES NOW, Williams Production RMT Company (referred to herein as “Applicant”), by and through its undersigned attorneys, and makes application to the Oil and Gas Conservation Commission of the State of Colorado (“COGCC”), for an order to pool all non-consenting interests for the drilling of wells in a 160-acre drilling and spacing unit in the Williams Fork Formation in the NE/4 of Section 27, Township 7 South, Range 96 West, 6th P.M., Garfield County, Colorado (“subject lands”). In support thereof, the Applicant states and alleges as follows:

1. That the Applicant is a corporation duly authorized to conduct business in the State of Colorado.
2. That the Applicant owns certain leasehold interests in the unit requested for pooling.
3. That pursuant to COGCC Orders established in Cause No. 510, specifically Order No. 510-14, a 160-acre drilling and spacing unit for the Williams Fork Formation was established constituting the Application Lands.
4. Applicant has drilled three Williams Fork wells within the 160-acre drilling and spacing unit described in paragraph 3 above. These are the SG 441-27, the SG 341-27 and the SG 41-27 wells.
5. That some of the parties listed on Exhibit A hereto own portions of the mineral estate in the subject lands. All of these parties have or will have been offered the option to participate in the costs of drilling of wells in the unit, but to date one or more of such parties have refused to participate. An AFE containing the information required by COGCC Rule 530.a. was sent respecting the wells more than thirty (30) days prior to the date of the hearing on this Application. A copy of an example of such AFE and letter is attached hereto as Exhibit B.

6. Moreover, that with respect to these same owners of unleased mineral interests listed on Exhibit A, Applicant has made reasonable attempts pursuant to COGCC Rule 530.b. to enter into leases with such parties but to date has been unsuccessful in such attempts.

7. That in order to prevent waste, protect correlative rights and in the best interests of conservation, all interests owned by the unleased mineral owners listed on Exhibit A should be pooled in the Williams Fork Formation in accordance with C.R.S. § 34-60-116 and Rule 530 of the COGCC.

8. That the names and addresses of the interested parties with respect to this Application are as set forth in Exhibit A hereto.

WHEREFORE, Applicant respectfully requests that this matter be set for hearing, that notice thereof be given as required by law and that upon such hearing this Commission enter its order that all unleased mineral interest owners who have refused to execute a lease covering their mineral interests in the Application Lands, or, alternatively have refused to participate in the costs of drilling the three (3) described wells and future wells be treated as non-consenting owners under C.R.S. § 34-60-116 and made subject to the terms and penalties provided for therein and for such other findings and orders as the Commission may deem proper or advisable in the premises.

DATED this 30th day of August, 2006.

Respectfully submitted:

Williams Production RMT Company

By:

William A. Keefe
POULSON, ODELL & PETERSON, LLC
1775 Sherman Street, Suite 1400
Denver, Colorado 80203
Telephone No.: (303) 861-4400
Facsimile No.: (303) 861-1225

Applicant's Address:

Williams Production RMT Company
ATTN: Chris Walsh
1515 Arapahoe Street
Tower 3, Suite 1000
Denver, CO 80202

VERIFICATION

STATE OF COLORADO

)

)

SS.

CITY AND COUNTY OF DENVER

)

Christopher M. Walsh of lawful age, being first duly sworn upon oath, deposes and says that he is the Senior Landman and that he has read the foregoing Application and that the matters therein contained are true to the best of his knowledge, information and belief.

By: _____
Christopher M. Walsh

Subscribed and sworn to before me this _____ day of August, 2006.

Witness my hand and official seal.

My commission expires: _____

Notary Public

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DOCKET NO:

STATE OF COLORADO)
)
) ss.
CITY AND COUNTY OF DENVER)

That he is the attorney for Williams Production RMT Company, that on August 30, 2006, he caused a copy of the attached Application in the subject docket to be deposited in the United States Mail, postage prepaid, addressed to the parties listed on Exhibit A to the Application.

My commission expires: July 22, 2007.

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EXHIBIT A

Williams Production RMT Company
1515 Arapahoe Street, Suite 1000
Denver, Colorado 80202

Alice T. Bell
P.O. Box 471
Parachute, CO 81635

UNION PACIFIC RAILROAD
COMPANY
C/O Farmer's National Company
Attention: Mr. Terry Young
403 S. Cheyenne, Suite 800
Tulsa, OK 74103-3842

Joan Wright
3766 North 15th Court
Grand Junction, CO 81506

Janet Smallwood
c/o Joan Wright
3766 North 15th Court
Grand Junction, CO 81506

Joseph Casteel
507 South 2nd St.
Carbondale, CO 81623

William A. Keefe
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Denver, Colorado 80203

Timothy Pinson
Garfield County
Henry Building
144 E. 3rd Street
Rifle, CO 81650

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