

Attachment #1

Williford Resources, LLC respectfully requests approval to vent the associated casinghead gas from the referenced rod-pumped oil well as a necessary and integral part of producing oil from this well. Williford had been selling its associated casinghead gas to Red Mesa Holdings until Red Mesa's recent bankruptcy forced that gas sales system to shut down. The successor operator, Hoshi/Atom, has recently been ordered by the COGCC to cease-and-desist any operations, so the restarting of that gas sales system is in an indeterminate state. Williford averaged 42 mcf/d of associated casinghead gas sales from 40 plus wells over the last 18 months on the Red Mesa Holdings gas system, which results in an approximate average of one (1) mcf per day per well. Attachment #2 is an area plat showing the well locations. There are no other gas gathering systems or gas pipelines within a five mile radius that are available for Williford to sell its associated casinghead gas. Because of the lack of active gas systems available in the area, Williford has no means physically or economically to sell the associated casinghead gas from this well. Williford does utilize some of the associated casinghead gas for lease purposes.

Attachment #3 is a copy of a representative gas analysis for the associated casinghead gas being produced from Williford's wells.

Within a short time period without venting this well, the casing pressure increases to a point which produces enough backpressure on the producing formation to cause the well to cease oil production. Therefore, this well is incapable of producing oil without venting.

Currently, all of Williford's producing wells in the area are shut-in awaiting COGCC approval to vent the associated casinghead gas. Any expedited processing possible for this application is requested and appreciated.