



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

RECEIVED

AUG 06 2009

COGCC

IN THE MATTER OF THE PROMULGATION
AND ESTABLISHMENT OF FIELD RULES TO
GOVERN OPERATIONS IN THE RULISON
FIELD, GARFIELD COUNTY, COLORADO

CAUSE NO. 139

DOCKET NO: 0908-SP-18

REQUEST FOR DIRECTOR APPROVAL OF APPLICATION ON THE
MERITS OF A VERIFIED APPLICATION AND SUPPORTING EXHIBITS

By Verified Application ("Verified Application") filed with the Colorado Oil and Gas Conservation Commission ("COGCC") on June 29, 2009, Williams Production RMT Company ("Applicant") by and through its attorneys, Beatty & Wozniak, L.P., requested that the COGCC establish an approximate 640 acre drilling and spacing unit and permit optional ten acre density drilling for certain described lands for the Williams Fork and Iles Formations of the Mesaverde Group. The Verified Application has not been contested. Pursuant to Rule 511.a., Applicant hereby requests that the Director recommend approval of the Verified Application on the basis of the merits and the supporting exhibits.

BACKGROUND AND STATUS OF THE APPLICATION

1. Applicant owns a leasehold interest in the Application Lands as described in its verified application.
2. That the Application Lands previously have been approved for ten acre density drilling within the Williams Fork Formation of the Mesaverde Group pursuant to the Commission's Order No. 139-85 dated March 31, 2008. Applicant has requested that the Application Lands be established as an approximate 640 acre drilling and spacing unit for the Williams Fork and Iles Formations and that ten acre density drilling thereon be approved for the production of gas and associated hydrocarbons from the Williams Fork and Iles Formations.
3. Approval of the Verified Application will allow gas and associated hydrocarbon substances from the Williams Fork and Iles Formations to be developed and will not result in violation of correlative rights and will prevent waste.

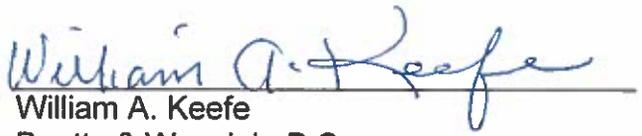
VERIFIED STATEMENT

Attached is the verified statements of Christopher M. Walsh, Senior Landman for Applicant, submitted in support of this request for the Director to recommend approval of the Verified Application on the basis of the merits and the supporting exhibits.

DATED: August 6, 2009.

Respectfully submitted,

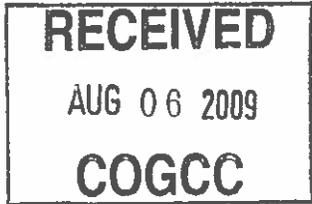
WILLIAMS PRODUCTION RMT COMPANY

By: 
William A. Keefe
Beatty & Wozniak, P.C.
216 Sixteenth Street, Suite 1100
Denver, Colorado 80202-5115
Telephone No.: (303) 407-4475

*WILLIAMS PRODUCTION RMT
COMPANY*



Cause No. 139
Docket No. 0908-SP-18
Williams Production RMT Company



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

Verified Statement of Christopher M. Walsh

In support of the request for Director approval of the Verified Application of Williams Production RMT Company in Cause No. 139, DOCKET NO. 0908-SP-18, pursuant to Rule 511.b, Christopher M. Walsh, Senior Landman of Williams Production RMT Company, upon oath, deposes and states as follows:

- a. I am currently employed as a Senior Landman of Williams Production RMT Company. I have been and am presently responsible for and have knowledge of the land position related to the Application Lands.
- b. I have testified previously as an expert witness in petroleum land matters before the COGCC and before Hearing Officers of the COGCC. Attached as Exhibit A is a copy of my resume prepared by me.

Williams operates approximately 75,610 acres of land with approved Williams Fork Formation ten acre well density of which 44,075 acres are fee lands and 31,535 acres are federal lands in the Rulison, Parachute and Grand Valley fields located in Townships 6-7 South, Ranges 93-96 West, 6th P.M. and situated in Garfield County, Colorado .The Application Lands are in the Rulison Field and are located and described as Township 7 South, Range 94 West, 6th P.M., Section 15: All. The Application Lands contain approximately 160 acres of fee owned land and 480 acres of federal lands.

The Application Lands are not spaced. The Application Lands do not have Williams Fork production or Iles production. Orders granting Williams Fork formation 10 acre well density on the Application Lands and lands that corner and abut the Application Lands have been granted to Williams in Orders 139-64 and 139-85. The testimony and exhibits support the approval of 10 acre density in the Williams Fork formation in this vicinity.

There are also lands contiguous with the Application Lands in which the COGCC has approved 10 acre well density for the Williams Fork and Iles formations on 640 acre spacing. Those lands are Section 11 and Section 16 in Township 7 South, Range 94 West and corner the Application Lands to the Northeast and abut the Application Lands to the West. Order 139-99 and 440-54 are the Orders that granted EnCana Oil & Gas (USA) Inc. the approval for the increased well density for both the Williams Fork and Iles formations.

Williams has focused its efforts mainly on developing the Williams Fork formation in this area, but does see potential in the Iles formation in the vicinity of the Application Lands. The testimony and exhibits from the EnCana Oil & Gas (USA) Inc., application that resulted in the issuance of Orders 139-99 and 440-54, will support the approval of 10 acre well density for the Iles formation for the Application Lands.

Additionally, the above mentioned Williams and EnCana orders provide that wells may be located down hole anywyere within the unit but no closer than 100 feet from the boundaries of the unit except in cases where the Application Lands abut or corner lands in which the COGCC has not at the time of drilling permit application granted the right to drill 10 acre density wells in which event the downhole location will not be closer than 200 feet from the boundary or boundaries of the drilling unit so abutting or cornering such lands. Williams is requesting similar set back requirements under this application.

Allowing 10 acre well density for the Iles formation in conjunction with the previously approve 10 acre well density for the Williams Fork formation will enable Williams to develop its assets economically while allowing Williams to protect it correlative rights from surrounding leases.

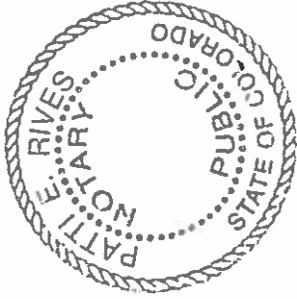
- c. I have not been advised of nor am not aware of any protests to this Application, Cause 139, Docket No. 0908-SP-18.
- d. The parties identified on the Exhibit A to the Application are the parties entitled to notice under the rules of the COGCC.

Christopher M. Walsh

Christopher M. Walsh

Subscribed to and sworn to before me this 3rd day of August, 2009 by Christopher M. Walsh, Senior Landman of Williams Production RMT Company.

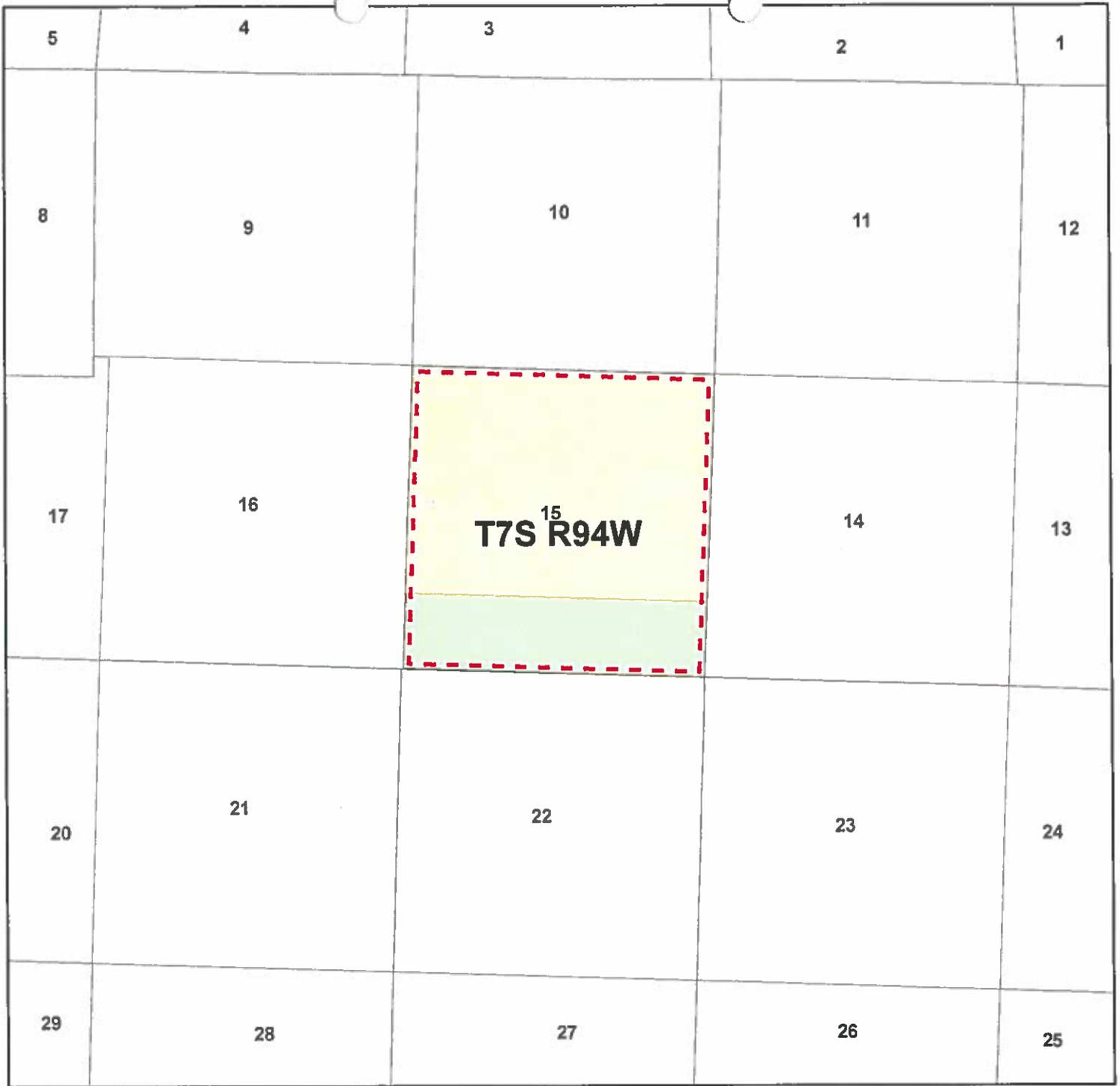
My Commission expires: 5/21/2011



Patti E. Rives

Notary Public

Address: 1515 Arapahoe St., Tower 3, #1000
Denver, CO 80202-2110



Application for Spacing - Section 15, 7S 94W

Proposed 640 acre Spacing Unit for the Williams Fork and Iles Formations



Legend

 Proposed Spacing

Williams Leasehold

 Federal Lease

 Mineral Interest

Exhibit:

Cause No. -

Docket No. -



Christopher M. Walsh
chris.walsh@williams.com

1515 Arapahoe Street
Tower 3, Suite 1000
Denver, CO 80202

(303) 572-3900

PROFESSIONAL EXPERIENCE

Williams Production RMT Company, Denver CO

2003 – 2009

Senior Landman Denver, CO (2005 – Present)

Piceance Basin, Colorado

- Prepare, review and negotiate drilling proposals, joint operating agreements, farmout agreements, pooling agreements
- Lease acquisition and renewals or extension, negotiation of lease terms and other oil and gas land related agreements
- Manage brokers to obtain leasehold, title curative, prepare communitization agreements, declarations of pooling, affidavits of production, request the preparation of abstracts and title opinions
- Negotiate acreage trades
- Prepare / review applications to COGCC to force pool, space, increase density, protest applications
- Testify at COGCC hearings
- Release pads for construction and wells for drilling

Consulting Landman Denver, CO (2003-2005)

Coalbed Methane Exploration, Powder River Basin, Wyoming

- Prepare Drilling Proposals, Joint Operating Agreements and AFEs
- Wyoming Oil and Gas Commission work: Force Pooling, Spacing and Location Exception Applications
- Well Releases and Title Curative
- Acreage Trades

ChevronTexaco Corp.

1990 - 2003

Originally employed by Texaco, became ChevronTexaco employee as a result of a merger.

Land Representative Houston TX (2001-2003)

Transitional role assisting the newly merged corporation with the conversion of Texaco agreements into the Chevron lease/agreement (LIS) and mapping (Via Vista) systems and served as resource for legacy Texaco procedures and methods.

Landman, Denver CO (1990-2001)

Supported Business Units of the Western Region by performing pre-sale / acquisition activities, marketing, closing activities, and post closing activities, including property analysis associated with sales

Exhibit A
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and acquisitions, and operation issues: negotiated and prepared purchase and sale agreements, like-kind exchange agreements and other documents associated with these tasks.

Landman

1978-1989

A variety of contract, staff positions; partner in a field and in-house service company with responsibilities including running crews of Landmen, lease acquisition and negotiation, title research of county, federal and state records, title curative, lease auctions and training.

EDUCATION

Bachelor of Arts in Business Administration
Western State College of Colorado, Gunnison, CO

ASSOCIATIONS

American Association of Professional Landmen, CPL
Denver Association of Petroleum Landmen

<p>Exhibit A-1 Cause No. 440 Docket No. 0905-AW-03</p>
