

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

IN THE MATTER OF CHANGES TO THE)	CAUSE NO. 1R
RULES AND REGULATIONS OF THE OIL)	
AND GAS CONSERVATION COMMISSION)	DOCKET NO. 0803-RM-02
OF THE STATE OF COLORADO)	

SCHEDULING SUGGESTION OF WILLIAMS FIELD SERVICES COMPANY, LLC
CONCERNING THE PRESENTATION OF MIDSTREAM INDUSTRY ISSUES

Williams Field Services Company, LLC (WFS) submits this scheduling suggestion to the Colorado Oil and Gas Conservation Commission (Commission).

1. During its hearing on May 22, 2008, the Commission voted to set aside a specific period of time in this rulemaking hearing during which the effects of the Commission’s proposed rules upon midstream natural gas operations will be addressed exclusively.

2. The Commission requested the Acting Director and two Commissioners meet in the very near term to create a suggested schedule for the rulemaking hearing.

3. WFS submits this scheduling suggestion to assist in that task.

4. WFS has two distinct groups of midstream concerns to present to the Commission. These distinct midstream concerns should be treated differently in the Commission’s schedule.

a. The first group of concerns are issues that involve the midstream industry only, and no other group directly. These are matters such as the extent of the Commission’s statutory jurisdiction to regulate midstream operations and the definition of a midstream “gathering line.”

b. The second group of concerns are substantive issues that also affect the exploration and production industry and others — but as to which midstream companies are affected very differently. These are matters like the effect of surface-water-related land use restrictions upon the location of buried gathering lines.

5. As to issues that involve the midstream industry exclusively, WFS suggests the following.

a. The following issues and facts should be presented to the Commission in the period reserved exclusively for midstream testimony: *i*) what the midstream industry is and how it works; *ii*) how midstream industry operations differ in important ways from the concerns underlying the proposed rules; *iii*) the Commission’s very limited statutory jurisdiction over midstream operations; *iv*) two important issues involving the critical definition of a gathering line; and *v*) Clean Water Act Section 404 issues.

b. WFS will consolidate testimony with others to save time and avoid duplication.

c. WFS requires one and one-half hours to present this testimony and its legal argument on these issues.

d. This time period should be scheduled when the Commission can most usefully contrast the information it will hear with the other facts and testimony presented at the hearing. It can occur near the end of the hearing.

6. As to the substantive concerns in this rulemaking that affect midstream operations differently from others, WFS suggests the following.

a. These contrasts between midstream operations and other concerns are best presented at the same time as the general, substantive presentations by others on the various substantive aspects of the proposed rules.

b. WFS would seek to be recognized to present its brief contrasting testimony near the end of a substantive presentation that affects it. This contrasting testimony would be very brief — likely five or ten minutes of explanation to the Commission by an attorney or a witness.

c. WFS seeks an aggregate of one additional hour to present this type of brief testimony throughout the rulemaking hearing.

7. WFS suggests that the total time allocated to address midstream issues in accordance with the Commission's decision on May 22, 2008 should not be subtracted from the total time allocated to other industry-parties in this proceeding.

WHEREFORE, WFS respectfully suggests the foregoing approaches to scheduling midstream participation in this hearing.

Dated this 27th day of May, 2008.

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of May, 2008, the following number of true and correct copies of the foregoing SCHEDULING SUGGESTION OF WILLIAMS FIELD SERVICES COMPANY, LLC CONCERNING THE PRESENTATION OF MIDSTREAM INDUSTRY ISSUES was served on the following, by the method and addressed as indicated below:

Patricia Beaver, Hearing Manager
Docket No. 0803-RM-02
Oil and Gas Conservation Commission
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Denver, Colorado 80203

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for HOLLAND & HART LLP