

STATE OF NEW MEXICO

COUNTY OF RIO ARriba

IN THE DISTRICT COURT

NEW MEXICO OIL CONSERVATION)	
DIVISION,)	
)	
Plaintiff,)	
)	No. RA 78-399
vs.)	
)	
HAN-SAN, INC.,)	
)	
Defendant.)	

ANSWERS TO INTERROGATORIES

Comes now Joe D. Ramey for the Plaintiff New Mexico Oil Conservation Division, and hereby answers under oath the Interrogatories propounded by Defendant as follows:

Q1. State your name and present address.

A1. Joe D. Ramey

Rt. 2, Box 331Y, Santa Fe, New Mexico 87501

Q2. State in what capacity you are employed with the plaintiff.

A2. Director

Q3. State the name, address and employment of all persons who have relevant information to support the allegation in your complaint that the defendant "knowingly and willfully violated the regulation and order of the Commission by its failure to comply with the terms of said Order."

A3. Joe D. Ramey, Rt. 2, Box 331Y, Santa Fe, New Mexico
Director, Oil Conservation Division

A. R. Kendrick, 802 Mossman Ave., Aztec, New Mexico
District Supervisor, Oil Conservation Division

Charles C. Gholson, Box 337, Bloomfield, New Mexico
Field Representative, Oil Conservation Division

Q4. State each and every fact upon which you will rely in support of your allegation that the defendant "knowingly and

willfully violated the regulation and order of the Commission by its failure to comply with the terms of said Order."

A4. Defendant received notice of the October 12, 1977, hearing as evidenced by the return receipt attached hereto as Exhibit A. Defendant has admitted in his Answer that he received notice of and appeared at the October 12, 1977, hearing. Defendant was mailed a copy of the order issued pursuant to that hearing, as evidenced by the letter attached hereto as Exhibit B. In approximately February, 1978, Kenneth Hand met with A. R. Kendrick and asked for a 60 day extension in which to comply with the terms of Order No. R-5567. Defendant has admitted in his Answer that by letter dated June 5, 1978, another extension was granted. Field inspections of the well by Charles Gholson on June 27, 1978, and October 6, 1978, showed that the well has not been plugged or placed on production.

JOE D. RAMEY

Subscribed and sworn to before me this _____ day of _____, 1978.

NOTARY PUBLIC

My Commission Expires:

NEW MEXICO OIL CONSERVATION DIVISION

By: _____
LYNN TESCHENDORF, Attorney
P. O. Box 2088
Santa Fe, New Mexico 87501