

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

**APPLICATION OF SAN JUAN RESOURCES,  
INC. FOR APPROVAL OF THE MCSIMMS  
(MANCOS) FEDERAL UNIT, RIO ARRIBA  
COUNTY, NEW MEXICO.**

**CASE NO. 25475**

**APPLICANT'S PRE-HEARING STATEMENT**

San Juan Resources, Inc. (OGRID No. 20208) ("SJR"), the applicant in the above referenced Case No. 25475, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

San Juan Resources, Inc.

**ATTORNEYS**

Ann Cox Tripp  
Melinda A. Branin  
P.O. Box 10  
Roswell, NM 88202-0010  
(575) 522-6510  
(575) 623-9332 fax  
Atripp@hinklelawfirm.com  
[Mbranin@hinklelawfirm.com](mailto:Mbranin@hinklelawfirm.com)

**OTHER PARTIES**

N/A

**ATTORNEYS**

N/A

**APPLICANT'S STATEMENT OF THE CASE**

SJR seeks an order an order approving the McSimms (Mancos) Federal Unit, consisting of approximately 7.094.52 acres of the following federal and patented lands situated in Rio Arriba County, New Mexico:

**Township 30 North, Range 4 West, N.M.P.M.**  
Section 1: All

Section 2: All  
 Section 11: All  
 Section 12: All  
 Section 13: All  
 Section 14: All  
 Section 23: All  
 Section 24: All  
 Section 25: All  
 Section 26: All  
 Section 35: N2  
 Section 36: N2

SJR is the designated operator under the proposed Unit Agreement and the unitized interval includes all depths from the top of the Mancos formation at 6,927 feet down to the stratigraphic equivalent of the base of the Mancos formation at a depth of 8,636 feet as encountered in the Carson #1 SWD well (API 30-039-26868) in the NW/4 Section 26, T30N, R4W. SJR has obtained approval of the proposed Unit Agreement by a sufficient percentage of the working interest owners to provide effective control of unit operations and has received approval of the Unit from the Bureau of Land Management.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Jerome P. McHugh, Landman	Self-Affirmed Statement	Approx. 4
Richard Boshier, Geologist	Self-Affirmed Statement	Approx. 5

#### **PROCEDURAL MATTERS**

SJR does not expect any opposition to this application and intends to present this matter by affidavit if unopposed.

Respectfully submitted,

**HINKLE SHANOR LLP**

By: /s/ Ann Cox Tripp  
Ann Cox Tripp  
Melinda A. Branin  
P.O. Box 10  
Roswell, NM 88202-0010  
(575) 522-6510  
(575) 623-9332 fax  
[Atripp@hinklelawfirm.com](mailto:Atripp@hinklelawfirm.com)  
[Mbranin@hinklelawfirm.com](mailto:Mbranin@hinklelawfirm.com)

*Attorneys for Applicant San Juan Resources, Inc.*

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

QUESTIONS

Action 491015

QUESTIONS

Operator: SAN JUAN RESOURCES, INC. 1499 Blake St, #10C Denver, CO 80202	OGRID: 20208
	Action Number: 491015
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.