

dugan production corp.

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CONSERVATION DIV.

September 26, 2001

FAXED TO: 505-476-3462

Ms. Florene Davidson
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: NMOCD Docket No. 32-01 for 10-4-01
NMOCD Case No. 12734
Application of Richardson Operating Company
Establish a special "infill well" area
Basin Fruitland Coal Pool
San Juan County, New Mexico

Dear Ms. Davidson,

Attached is Dugan Production's pre-hearing statement for the captioned case.

To have this statement timely filed, we are sending by fax and will forward the original by regular mail.

Please let me know if you have any questions regarding this matter.

Sincerely,

John D. Roe
Engineering Manager

JDR/tmf

attachment

cc: John Dean
Tom Kellahin for Richardson Operating Company

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

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

CASE NO. 12734

APPLICATION OF: RICHARDSON OPERATING COMPANY
TO ESTABLISH A SPECIAL "INFILL WELL" AREA WITHIN
THE BASIN FRUITLAND COAL GAS POOL AS AN
EXCEPTION FROM RULE 4 OF THE SPECIAL RULES
FOR THIS POOL, SAN JUAN COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This prehearing statement is submitted by Thomas A. Dugan for Dugan Production Corp.
as required by Oil Conservation Division Rule 1208.B.

APPEARANCES OF PARTIES

OPPOSITION OR OTHER PARTY

ATTORNEY

Dugan Productin Corp.
by Thomas A. Dugan, President

Representing himself

STATEMENT OF CASE

OPPOSITION OR OTHER PARTY

Dugan Production Corp. holds oil and gas leasehold interest within and adjacent to the area Richardson Operating Company has proposed as a special "infill well" area in the subject application. Since we are a party that may be affected by this application, we plan to attend the hearing and make an appearance for the record. At this time, we do not plan to present testimony and do not anticipate an active participation at the hearing.

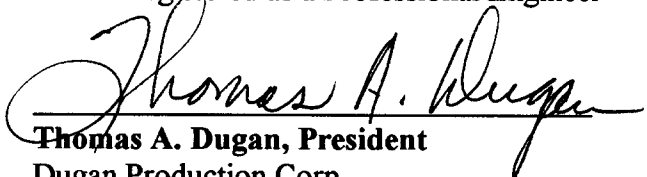
PROPOSED EVIDENCE

OPPOSITION OR OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Thomas A. Dugan, President and Petroleum Engineer	None anticipated	None anticipated

PROCEDURAL MATTERS
(Please identify any procedural matters which
need to be resolved prior to the hearing)

Thomas A. Dugan, President and owner of Dugan Production Corp. desires to represent himself on behalf of Dugan Production Corp. in this case. Mr. Dugan has a Petroleum Engineering Degree from the University of Oklahoma and is registered as a Professional Engineer in the State of New Mexico.


Thomas A. Dugan, President
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