

A. DEAN MAMMEL

July 23, 2008

CERTIFIED MAIL

RECEIVED

2008 JUL 28 PM 3 16

Mr. mark E. Fesmire, Director  
Oil Conversation Division  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

RE: Blancett Ranch "24", T30N, R12W  
Unit of Section 24, T30N, R12W  
2435 feet FNL and 450 feet FEL  
Application of San Juan Resources, Inc.  
for an unorthodox gas well location  
Base Dakota Gas Pool and Blanco Mesaverde Gas Pool  
San Juan County, New Mexico

Dear Mr. Fesmire,

Regarding the above "Unorthodox" Drilling Application from W. Thomas Kellahin on behalf of San Juan Resources, Inc., I am questioning (as an interest-owner in the San Juan Resources Kaempf #1 Well, T30N, R11W) the "fairness" to all interest owners of the Kaempf #1 Well.

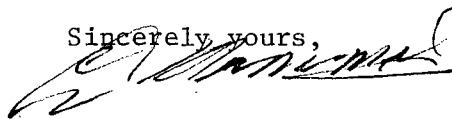
The "new" borehole location would be obtaining about 25% of its production from the Kaempf well well resevoir. This is a 30+ year old well that is productive but would suffer significantly from this "draw-down" of its remaining reserves.

I am given to understand that the surface owner has personal reasons for requesting this "unorthodox" well location.

It would appear to me, that "rairness" should allow the Kaempf #1 Well Owners should be entitles to a "Pro-Rata" participation in this new well which will be drawing on its reserves.

Your consideration of the foregoing, would be appreciated.

Sincerely yours,



A. D. Mammel

Enclosures

**KELLAHIN & KELLAHIN**  
**Attorney at Law**

**W. THOMAS KELLAHIN**  
**706 GONZALES ROAD**  
**SANTA FE, NEW MEXICO 87501**

**TELEPHONE 505-982-4285**  
**FACSIMILE 505-982-2047**  
**TKELLAHIN@COMCAST.NET**

July 18, 2008

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

**NOTICE OF THE FOLLOWING NEW MEXICO OIL CONSERVATION  
DIVISION ADMINISTRATIVE CASE:**

*OFFSETTING WORKING INTEREST OWNERS:*

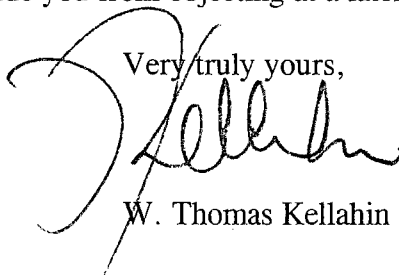
*Re: Administrative Application of San Juan Resources, Inc. for approval  
of unorthodox well location for its Blancett Ranch "24" Well No. 1, Unit H,  
E/2 of Section 24, T30N, R12W, San Juan County, New Mexico.*

Dear interest owner:

On behalf of San Juan Resources, Inc. please find enclosed a copy of its referenced administrative application. This notice is based upon records that indicate that you have either an unleased mineral interest or a working interest offsetting the E/2 of Section 24 within the Dakota and/or Mesaverde formations.

If you have no objection, then there is nothing for you to do. If you are willing to waive objection, please sign this letter as indicated and return it to me. However, should you have any objection to the Division approving this application, then it will be necessary for you to file a written objection with the New Mexico Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505 within twenty (20) days of the date of this letter. Failure to file a timely objection will preclude you from objecting at a later date.

Very truly yours,



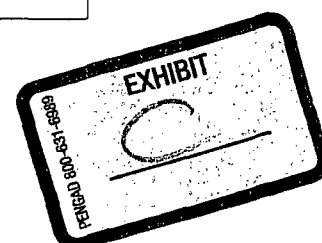
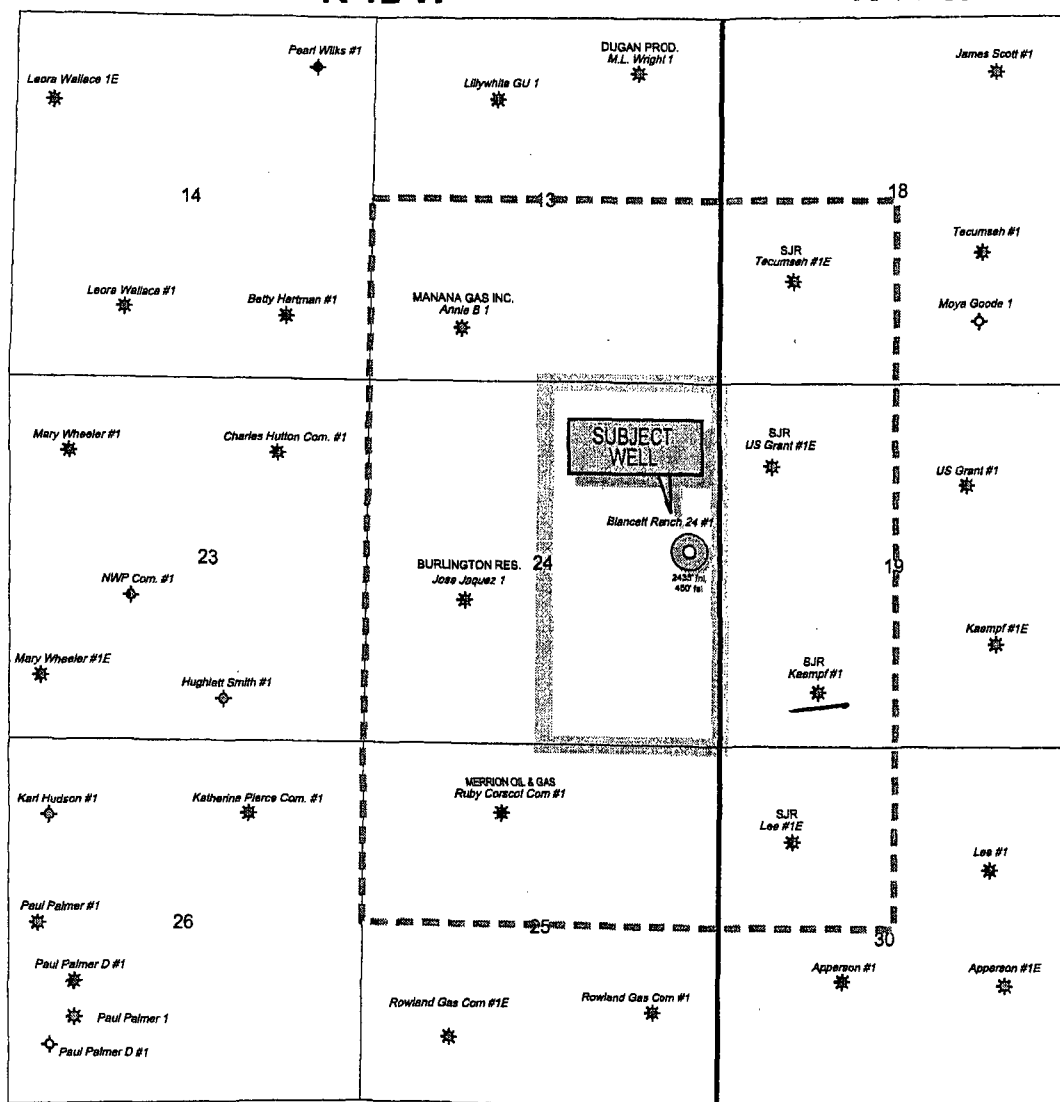
W. Thomas Kellahin

**WAIVER OF OBJECTION:**

By: \_\_\_\_\_ with authority for  
and on behalf of \_\_\_\_\_  
Date: \_\_\_\_\_


R 12 W

R 11 W



LEGEND

- ✱ Blanco Mesaverde
- ✧ Basin Dakota



**SAN JUAN  
RESOURCES INC.**

1499 BLAKE STREET, 10C  
DENVER, COLORADO 80202  
PHONE 303-673-8333

**AZTEC AREA**  
SAN JUAN COUNTY, NEW MEXICO

**BLANCETT RANCH 24 #1 WELL**  
**NON-STANDARD LOCATION PLAT**

Township 30 North, Range 12 West, New Mexico Principal Meridian

MAP SCALE : 1" = 2,700'

**KELLAHIN & KELLAHIN**  
**Attorney at Law**

**W. THOMAS KELLAHIN**  
**706 GONZALES ROAD**  
**SANTA FE, NEW MEXICO 87501**

**TELEPHONE 505-982-4285**  
**FACSIMILE 505-982-2047**  
**TKELLAHIN@COMCAST.NET**

July 15, 2008

**HAND DELIVERED**

Mr. Mark E. Fesmire, Director  
Oil Conservation Division  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

Re:   Blancett Ranch "24" Well No. 1  
      Unit H of Section 24, T30N, R12W  
      2435 feet FNL and 450 feet FEL  
      Administrative Application of San Juan Resources, Inc.  
      for an unorthodox gas well location,  
      Basin Dakota Gas Pool and Blanco Mesaverde Gas Pool  
      San Juan County, New Mexico

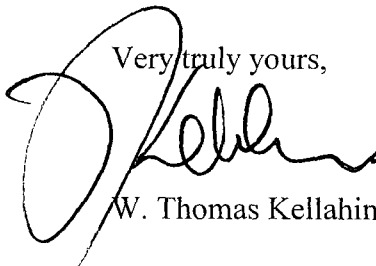
*Case 14179*

RECEIVED  
2008 JUL 17 AM 10 45

Dear Mr. Fesmire:

On behalf of San Juan Resources Inc., please find enclosed our referenced administrative application.

Very truly yours,



W. Thomas Kellahin

cc:   San Juan Resources, Inc.  
      Attn: Jerry McHugh

ABOVE THIS LINE FOR DIVISION USE ONLY

## NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505



San Juan Resources  
INC  
Blancett Ranch 24#1

### ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

#### Application Acronyms:

**[NSL-Non-Standard Location]** **[NSP-Non-Standard Proration Unit]** **[SD-Simultaneous Dedication]**  
**[DHC-Downhole Commingling]** **[CTB-Lease Commingling]** **[PLC-Pool/Lease Commingling]**  
**[PC-Pool Commingling]** **[OLS - Off-Lease Storage]** **[OLM-Off-Lease Measurement]**  
**[WFX-Waterflood Expansion]** **[PMX-Pressure Maintenance Expansion]**  
**[SWD-Salt Water Disposal]** **[IPI-Injection Pressure Increase]**  
**[EOR-Qualified Enhanced Oil Recovery Certification]** **[PPR-Positive Production Response]**

#### [1] TYPE OF APPLICATION - Check Those Which Apply for [A]

[A] Location - Spacing Unit - Simultaneous Dedication  
☒ NSL ☐ NSP ☐ SD

Check One Only for [B] or [C]

[B] Commingling - Storage - Measurement  
☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery  
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

[D] Other: Specify \_\_\_\_\_

#### [2] NOTIFICATION REQUIRED TO: - Check Those Which Apply, or ☐ Does Not Apply

[A] ☒ Working, Royalty or Overriding Royalty Interest Owners

[B] ☒ Offset Operators, Leaseholders or Surface Owner

[C] ☐ Application is One Which Requires Published Legal Notice

[D] ☐ Notification and/or Concurrent Approval by BLM or SLO  
 U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office

[E] ☐ For all of the above, Proof of Notification or Publication is Attached, and/or,

[F] ☐ Waivers are Attached

#### [3] SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Print or Type Name

Signature

Kellahin & Kellahin  
 Attorneys At Law  
 Title  
 706 Gonzales Rd.  
 Santa Fe, NM 87501  
 Email Address

Date

7/16/08

RECEIVED  
 2008 JUL 17 AM 10 45

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

**IN THE MATTER OF THE APPLICATION  
OF SAN JUAN RESOURCES, INC.  
FOR AN UNORTHODOX GAS WELL LOCATION,  
SAN JUAN COUNTY, NEW MEXICO.**

*Case 14179*

**ADMINISTRATIVE APPLICATION**

San Juan Resources Inc. ("SJR") by its attorneys, Kellahin & Kellahin, and seeks an order authorizing the drilling and production of its Blancett Ranch "24" Well No. 1 at an unorthodox gas well location 2435 feet from the North line and 450 feet from the East line (Unit H) of Section 24, Township 30 North Range 12 West, NMPM to be dedicate to a standard 320-acre gas spacing unit dedicated to production from the Basin-Dakota Gas Pool and the Blanco Mesaverde Gas Pool

In support of its application SJR states:

1. SJR proposes to drill its Blancett Ranch "24" Well No. 1 (**API # 30-045-33769**) at an unorthodox gas well location 2435 feet FNL and 450 feet FEL (Unit H) of Section 24, T30N, R12W, San Juan County, New Mexico and dedicated it to 320-acre gas spacing units consisting of the E/2 of this section. **See C-102s attached as Exhibit "A" and "B"**
2. This spacing unit is subject, among other things, to the Special Rules and Regulations for the Basin-Dakota Gas Pool Pool (pool code 71599) and Order R-10981-B (1), effective January 29, 2002) requiring 320-acre standard spacing units and well to be located not closer than 660 feet of a quarter section line.
3. Also this spacing unit is subject, among other things, to the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool (pool code 72319) and Order R-10987-A (1), effective December 2, 2002) requiring 320-acre standard spacing units and well to be located not closer than 660 feet of a quarter section line.

### TOPOGRAPHIC EVIDENCE

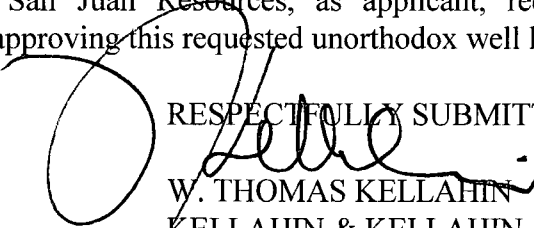
4. SJR is unable to place the wellbores at a standard well location because the surface owner, Blancett Ranches, does not want it to interfere with its fields:
  - a. Exhibit "C" is a map showing the offsetting Dakota and MV wells
  - b. Exhibit "D" is a topographical locator map
  - c. Exhibit "E" is a photo view to the north across the Blancett's fields
  - d. Exhibit "F" is a photo view looking north from the proposed NSL which is adjacent to a compressor station,
  - e. Exhibit "G" is a photo view looking NE from the proposed NSL showing fields where a standard location would be located.
5. As an accommodation to the surface owner, SJR is willing to place the well at the requested unorthodox location.

### NOTIFICATION

6. SJR's proposed location encroaches towards the W/2 of Section 19, T30N R11W operated by San Juan Resources and developed with two 320-acre spacing units oriented N/2 and S/2.
7. Notification is being sent to the surface owner, Blancett Land & Cattle LLC
8. In accordance with the Division's notice requirements, a copy of this application has been sent to SJR's working interest owners in the N/2 and S/2 of Section 19. In addition, SJR is sending notice to its working interest owners in Sections 18 and 30 of T30N R11W and to Section 13 (S/2), Section 24(W/2 and Section 25 (N/2) of T30N, R12W **See Exhibit "H" attached**

WHEREFORE, San Juan Resources, as applicant, requests that the Division enter its order approving this requested unorthodox well location

RESPECTFULLY SUBMITTED:

  
W. THOMAS KELLAHIN  
KELLAHIN & KELLAHIN  
706 Gonzales Road  
Santa Fe, New Mexico 87501  
Telephone: (505) 982-4285  
Fax: (505) 982-2047

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone (505) 393-6161 Fax (505) 393-0720

**District II**  
1301 W. Grand Ave., Arterio, NM 88210  
Phone (505) 748-1283 Fax (505) 748-9720

**District III**  
1000 Rio Erasos Rd., Aztec, NM 87410  
Phone (505) 334-6178 Fax (505) 334-6170

**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone (505) 476-3470 Fax (505) 476-3462

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

Form C-102  
Permit 30972

**WELL LOCATION AND ACREAGE DEDICATION PLAT**

1. API Number 30-045-33769	2. Pool Code 71599	3. Pool Name BASIN DAKOTA (PRORATED GAS)
4. Property Code 35731	5. Property Name BLANCETT RANCH 24	6. Well No. 001
7. OGRID No. 20208	8. Operator Name SAN JUAN RESOURCES, INC.	9. Elevation 5635

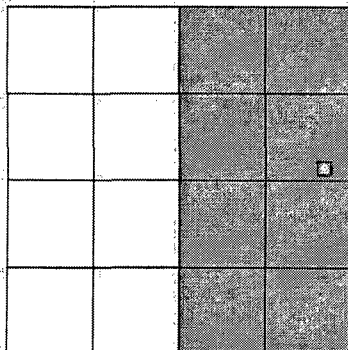
**10. Surface Location**

UL Lot H	Section 24	Township 30N	Range 12W	Lot 1/4 	Feet From 2435	N/S Line N	Feet From 450	E/W Line E	County SAN JUAN
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**11. Bottom Hole Location If Different From Surface**

UL Lot 	Section 	Township 	Range 	Lot 1/4 	Feet From 	N/S Line 	Feet From 	E/W Line 	County 
12. Dedicated Acres 320.00	13. Joint or Infill 	14. Consolidation Code Communization	15. Order No. 						

**NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION**



**OPERATOR CERTIFICATION**

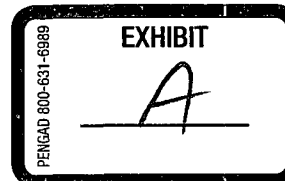
*I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location(s) or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.*

E-Signed By: Lori Walters  
Title: Manager  
Date: 5/31/2006

**SURVEYOR CERTIFICATION**

*I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.*

Surveyed By: Jason Edwards  
Date of Survey: 5/1/2006  
Certificate Number: 15269





**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (505) 393-6161 Fax: (505) 393-0720

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**Santa Fe, NM 87505**

Form C-102  
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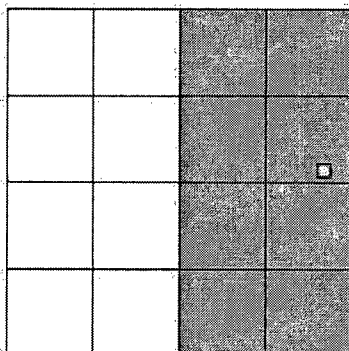
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UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
12. Dedicated Acres 320.00	13. Joint or Infill	14. Consolidation Code Communization	15. Order No.						

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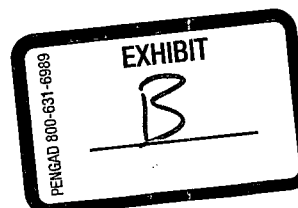
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E-Signed By: Lori Walters  
Title: Manager  
Date: 5/31/2006

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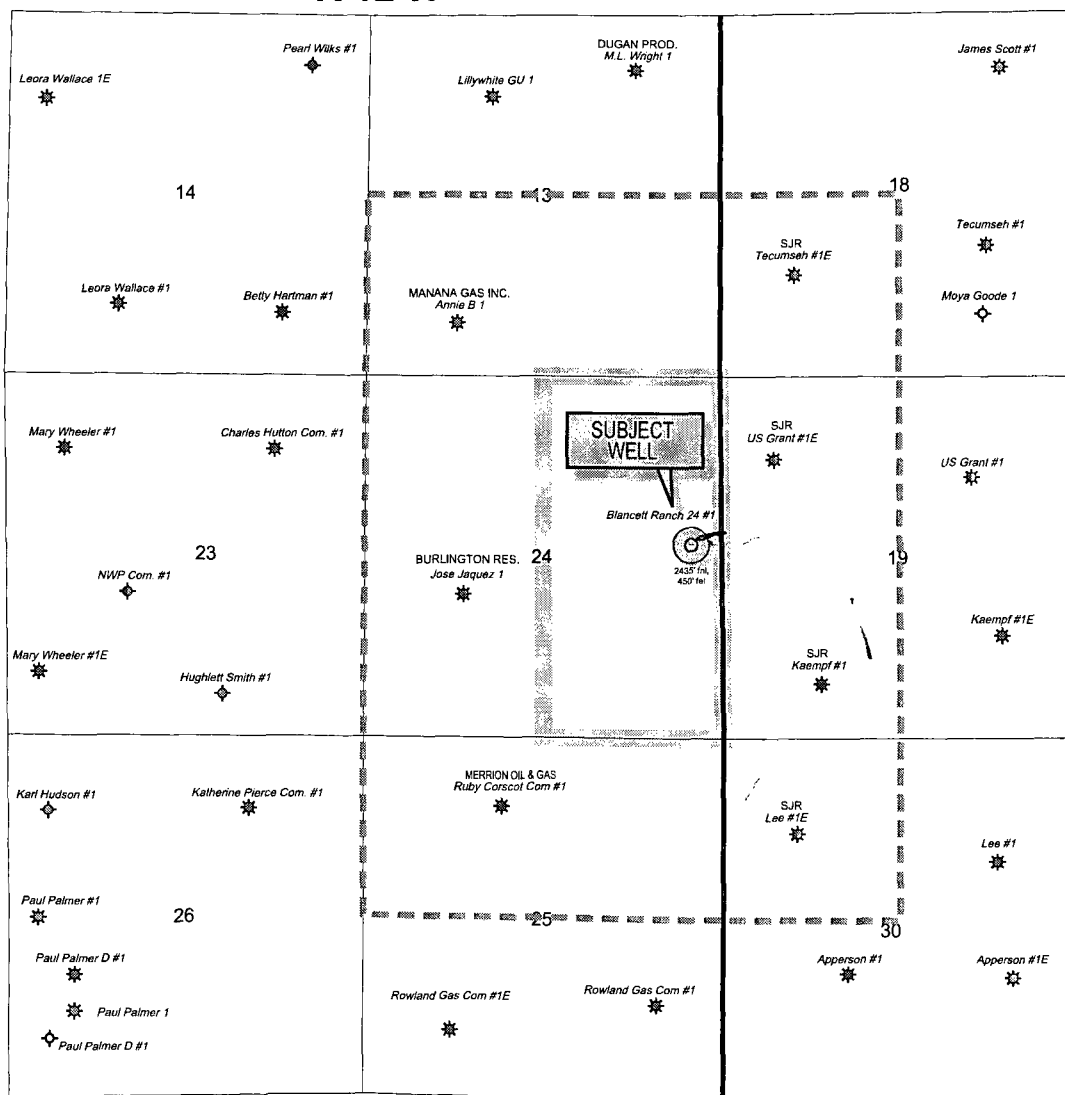
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Certificate Number: 15269

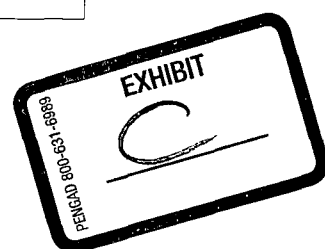


R 12 W

R 11 W




T  
30  
N



LEGEND

- ✱ Blanco Mesaverde
- ✱ Basin Dakota



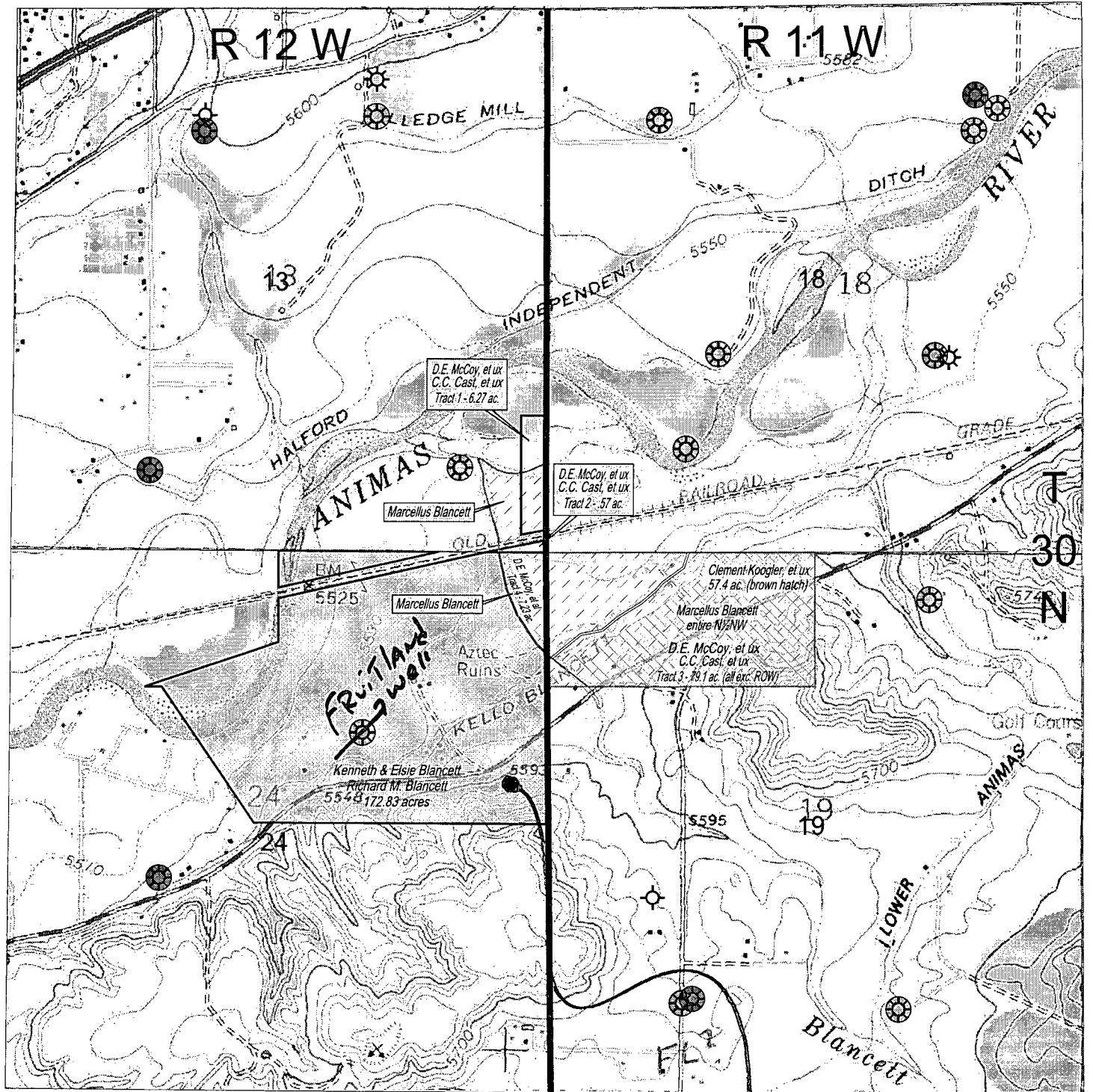
**SAN JUAN**  
COUNTY




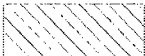
1499 BLAKE STREET, 10C  
DENVER, COLORADO 80202  
PHONE 303-573-6333

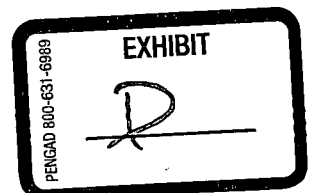
**AZTEC AREA**  
SAN JUAN COUNTY, NEW MEXICO

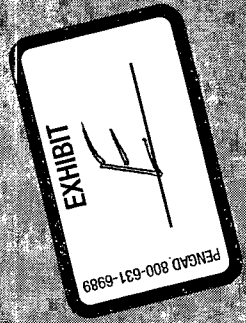
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**NON-STANDARD LOCATION PLAT**  
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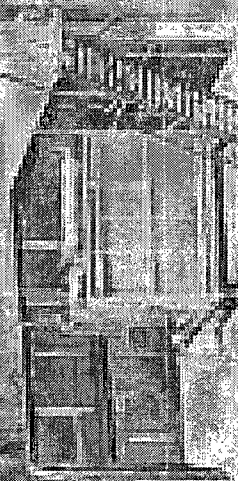
- |   |   |   |                                    |
|---|---|---|------------------------------------|
|  | Kenneth & Elsie M. Blancett<br>Richard M. Blancett      |  | Marcellus Linn and Violet Blancett |
|  | D. E. and Virginia E. McCoy<br>Cecil C. and Gladys Cast |  | Clement and Elsie Koogler          |







PENGAD 800-631-6989  
EXHIBIT  
F





EXHIBIT

9

PENGAD 800-631-6989

James Martin  
943 T Avenue  
R.R. 1, Box 321  
Council Grove, KS 66846-8777

Providence Minerals, LLC  
Attn: Karen Herbst  
14860 Monfort Drive Suite 209  
Dallas, TX 75254

George A. Mosley  
42307 N. Newport Hwy  
Elk, WA 99009

O. Leonard & Leona M. Mosley  
P O Box 311  
Rozet, WY 82727

Mary Gwendolyn Mosley  
P O Box 9201  
Brooks, OR 97305

Bob L. Mosley  
P.O. Box 1653  
Aztec, NM 87410

Betty A. Handley  
P.O. Box 737  
Newport, WA 99156-0737

St. Francis Xavier Church  
Attn: Sheldon Moore  
524 9th Street  
Wilmette, IL 60091

Church of the Redeemer  
Attn: Cynthia Sweigert  
5700 Forbes Ave  
Pittsburg, PA 15127-1526

St. Johns Parish  
Attn: Stephen Maltby  
P.O. Box 224  
South Salem, NY 10590

Mammel, A.D.  
4642 N. Versailles Ave.  
Dallas, TX 75209-6016

Merrion Oil & Gas  
610 Reilly Ave  
Farmington, NM 87401-2634

Energen Resources Corp  
Attn: Cindy Russo  
605 Richard Arrington Jr Blvd  
North  
Birmingham, AL 35203-2707

Jel Resources, LLC  
475 17th St. Suite 980  
Denver, CO 80202

Vfc Company, LLC  
475 17th Street Suite 980  
Denver, CO 80202

Dugan Production Corp  
Attn: Mr. Tom Dugan  
Post Office Box 420  
Farmington, NM 87499

Norman L. and Loretta Gilbreath  
Post Office 208  
Aztec, NM 87410

Peak Oil & Gas Inc  
3473 Main Avenue  
Durango, CO 81301

ConocoPhillips Company  
Attn: Benson W. Malone  
3401 E. 30th  
Farmington,, NM 87402-8807

Burlington Resources  
ConocoPhillips Company  
Attn: Benson W. Malone  
3401 E. 30th  
Farmington, NM 87402

XTO Energy Inc.  
Attn: Chris Spencer  
810 Houston Street, ste 2000  
Fort Warth, TX 76102-6203

Jean Bleakley Trustee  
2633 Bulrush Lane  
Naples, FL 34105

Barbara K. Kullas  
6506 Warriors Run  
Littleton, CO 80125

Candace Lenore Cox  
17 South Meadow Ridge  
Concord, MA 01742

William G. Drosten, Jr. TR  
PO Box 14633, 510 Locust Street  
St. Louis, MO 63178

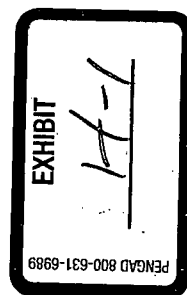
Western Distributing  
P.O. Box 5542 TA  
Denver, CO 80217

Ellen Berend  
9969 Hilgard Ave  
Los Angeles, CA 90095

Robert F. Travis  
4195 Lakeside Drive  
Jacksonville, FL 32210

Harvard & LeMay Exploration, Ltd.  
Attn: Jeff Harvard  
Post Office Box 936  
Roswell,, NM 88202

Lamp Investments  
Attn: Bill C. Elms, Trustee  
Post Office Box 6583  
Odessa, TX 97960



Ruth Bullis  
5526 Aldine Bender  
Houston, TX 77032

Sylvia F. Little, Trustee  
7242 E. Joshua Tree Lane  
Scottsdale, AZ 85250

Hartman Oil & Gas, LLC  
Attn: Edward Hartman  
2520 Tramway Terrace Court NE  
Albuquerque, NM 87122

Manana Gas, Inc.  
Attn: Edward Hartman  
2520 Tramway Terrace Court NE  
Albuquerque, NM 87122

Ed and Betty M. Hartman  
Attn: Edward Hartman  
2520 Tramway Terrace Court NE  
Albuquerque, NM 87122

Paul McCulliss  
5400 S. Grape Lane  
Littleton, CO 80121

George Vaught  
P.O. Box 13557  
Denver, CO 80201

Union Pacific Railroad  
Attn: Terry Young  
403 S. Cheyenne Avenue Ste. 800  
Tulsa, OK 77212

Maralex Resources, Inc.  
Attn: Micky O'Hare  
775 Goodard Avenue  
Ignacio, CO 81137

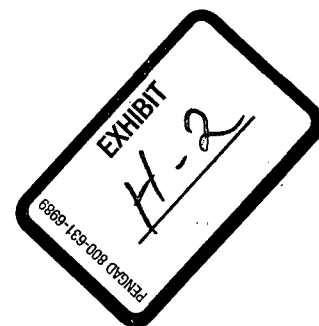
Georgia Lee Kelton aka Georgia Lee  
Bright  
5500 Old Clarksville Road  
Reno, TX 75462

The Trommald Family Trust, John  
E. and Heather Trommald, Trustees  
17056 Marina Bay Drive  
Hamington Beach, CA 92649

L.G. Krieger Marital Trust Bank of  
the West, Trustee  
3800 Arapahoe Avenue  
Boulder, CO 80303

Malcolm C. Todd  
3950 27th Road N  
Arlington, VA 22207

Gladys Murphy  
No last Known Address of Record





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July 18, 2008

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

**NOTICE OF THE FOLLOWING NEW MEXICO OIL CONSERVATION  
DIVISION ADMINISTRATIVE CASE:**

*OFFSETTING WORKING INTEREST OWNERS:*

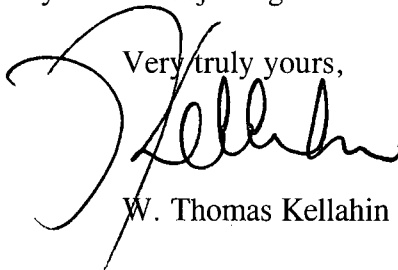
*Re: Administrative Application of San Juan Resources, Inc. for approval  
of unorthodox well location for its Blancett Ranch "24" Well No. 1, Unit H,  
E/2 of Section 24, T30N, R12W, San Juan County, New Mexico.*

Dear interest owner:

On behalf of San Juan Resources, Inc. please find enclosed a copy of its referenced administrative application. This notice is based upon records that indicate that you have either an unleased mineral interest or a working interest offsetting the E/2 of Section 24 within the Dakota and/or Mesaverde formations.

If you have no objection, then there is nothing for you to do. If you are willing to waive objection, please sign this letter as indicated and return it to me. However, should you have any objection to the Division approving this application, then it will be necessary for you to file a written objection with the New Mexico Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505 within twenty (20) days of the date of this letter. Failure to file a timely objection will preclude you from objecting at a later date.

Very truly yours,



W. Thomas Kellahin

**WAIVER OF OBJECTION:**

By: \_\_\_\_\_ with authority for  
and on behalf of \_\_\_\_\_  
Date: \_\_\_\_\_