

**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:**

**APPLICATION OF SAN JUAN RESOURCES, INC.  
FOR COMPULSORY POOLING  
SAN JUAN COUNTY, NEW MEXICO**

**CASE NO. 14445**

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2010 MAR 29 A 10:52

**FIRST AMENDED PRE-HEARING STATEMENT**

This first amended pre-hearing statement is submitted by San Juan Resources, Inc. as required by the New Mexico Oil Conservation Division.

**APPEARANCES OF THE PARTIES**

**APPLICANT**

San Juan Resources, Inc.

**ATTORNEY**

W. Thomas Kellahin, Esq.  
706 Gonzales Road  
Santa Fe, NM 87501  
Phone 505-982-43285  
Fax 505-216-2780

**OPPONENT**

NONE—no other pre-hearing statements filed

**ATTORNEY**

**STATEMENT OF THE CASE**

Applicant seeks an order pooling all mineral interests from the base of the Pictured Cliffs formation to the base of the Dakota formation underlying a 320-acre standard spacing unit consisting of the E/2 of Section 24, T30N, R12W, NMPM, San Juan County, New Mexico, forming a standard 320-acre gas spacing and proration unit for any production from the base of the Pictured Cliffs formation to the base Dakota formation, including but not limited to the Basin-Dakota Gas Pool and Blanco-Mesaverde Gas Pool. This unit is to

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be dedicated its Blancett Ranch 24 Well No. 1 (API#30-045-33769) to be drilled at a previously approved unorthodox location in Unit H of this section for downhole commingled production from the Blanco-Mesaverde Gas Pool and the Basin-Dakota Gas Pool. Also to be considered will be the costs of drilling and completion this well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of San Juan Resources, Inc. as the operator of the well and a 200% charge for risk involved in this well. **IN THE ABSENCE OF OBJECTION, THIS APPLICATION WILL BE TAKEN UNDER ADVISEMENT.**

### PROPOSED EVIDENCE

#### WITNESSES

#### EST. TIME

#### EST. EXHIBITS

BY AFFIDVIT the testimony for  
Jerry McHugh, Jr.  
President and owner of  
San Juan Resources, Inc.

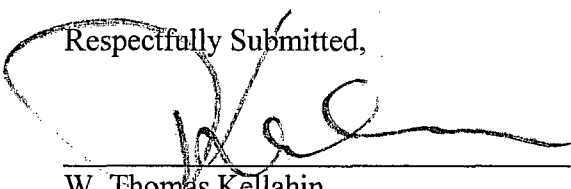
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### PROCEDURAL MATTERS

None

Respectfully Submitted,

  
\_\_\_\_\_  
W. Thomas Kellahin  
KELLAHIN & KELLAHIN

### CERTIFICATE OF SERVICE

On March 29, 2010, the undersigned cause to be delivered by email a copy of this pleading to all counsel of record:

David K Brooks, Esq. OCD attorney for Examiner

  
\_\_\_\_\_  
W. Thomas Kellahin

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

RECEIVED OOD  
2010 MAR 22 A 10:11  
*See amended P.H.S.*

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

APPLICATION OF SAN JUAN RESOURCES, INC.  
FOR COMPULSORY POOLING  
SAN JUAN COUNTY, NEW MEXICO

CASE NO. 14445

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by San Juan Resources, Inc. as required by the New Mexico Oil Conservation Division.

**APPEARANCES OF THE PARTIES**

**APPLICANT**

San Juan Resources, Inc.

**ATTORNEY**

W. Thomas Kellahin, Esq.  
706 Gonzales Road  
Santa Fe, NM 87501  
Phone 505-982-43285  
Fax 505-216-2780

**OPPONENT**

NONE

**ATTORNEY**

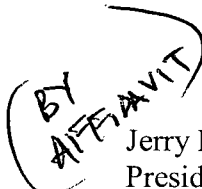
**STATEMENT OF THE CASE**

*E/R*  
Applicant seeks an order pooling all mineral interests from the base of the Pictured Cliffs formation to the base of the Dakota formation underlying a 320-acre standard spacing unit consisting of the W/2 of Section 24, T30N, R12W, NMPM, San Juan County, New Mexico, forming a standard 320-acre gas spacing and proration unit for any production from the base of the Pictured Cliffs formation to the base Dakota formation, including but not limited to the Basin-Dakota Gas Pool and Blanco-Mesaverde Gas Pool. This unit is to

*WTS 3/22/10*

be dedicated its Blancett Ranch 24 Well No. 1 (**API#30-045-33769**) to be drilled at a previously approved unorthodox location in Unit H of this section for downhole commingled production from the Blanco-Mesaverde Gas Pool and the Basin-Dakota Gas Pool. Also to be considered will be the costs of drilling and completion this well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of San Juan Resources, Inc. as the operator of the well and a 200% charge for risk involved in this well. **IN THE ABSENCE OF OBJECTION, THIS APPLICATION WILL BE TAKEN UNDER ADVISEMENT.**

#### **PROPOSED EVIDENCE**

<b>WITNESSES</b>	<b>EST. TIME</b>	<b>EST. EXHIBITS</b>
 Jerry McHugh, Jr. President and owner of San Juan Resources, Inc. (by affidavit)	10 minutes	@ 4

#### **PROCEDURAL MATTERS**

None

Respectfully Submitted,

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W. Thomas Kellahin  
KELLAHIN & KELLAHIN

#### **CERTIFICATE OF SERVICE**

On March 22, 2010, the undersigned cause to be delivered by email a copy of this pleading to all counsel of record:

David K Brooks, Esq. OCD attorney for Examiner

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W. Thomas Kellahin