

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

**APPLICATION OF SAN JUAN RESOURCES,  
INC. FOR APPROVAL OF THE REGINA  
RANCH (DEEP) UNIT, SANDOVAL COUNTY,  
NEW MEXICO.**

**CASE NO. 22508**

**APPLICANT'S PREHEARING STATEMENT**

San Juan Resources, Inc. (OGRID No. 20208) submits this Prehearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

San Juan Resources, Inc.  
1499 Blake Street, Suite 10C  
Denver, CO 80202

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com

**APPLICANT'S STATEMENT OF CASE**

Applicant seeks approval of the Regina Ranch (Deep) Unit consisting of approximately 7,279 acres of Federal and Patented lands situated in all or parts of the Sections 28-33 of Township 23 North, Range 1 West, and Sections 4-9, 16-17 of Township 22 North, Range 1 West, NMPM, Sandoval County, New Mexico. The unitized interval is all formations below the Top of the Mancos Formation, which is defined as the stratigraphic equivalent of 5,400 feet MD in the Regina

Ranch Federal 32-1 well located in the SW/4, Section 32, Township 23 North, Range 1 West, N.M.P.M., Sandoval County, New Mexico (API#30-043-20989). Federal lands comprise over 69% of the proposed Unit and Applicant has received a letter from the Bureau of Land Management approving the proposed unit area and Unit Agreement. Applicant expects to obtain approval of the proposed Unit Agreement by a sufficient percentage of the working interest owners to provide effective control of unit operations.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Jerome P. McHugh, Jr., Landman	Via Affidavit	Approx. 3
Richard Bosher, Geologist	Via Affidavit	Approx. 7

**PROCEDURAL MATTERS**

Since this is a purely voluntary unit, Applicant does not expect any opposition to this Application and intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



By: \_\_\_\_\_

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Post Office Box 2208  
Santa Fe, NM 87504  
505-998-4421  
505-983-6043 Facsimile  
mfeldewert@hollandhart.com  
arankin@hollandhart.com  
Jbroggi@hollandhart.com

**ATTORNEYS FOR SAN JUAN RESOURCES, INC.**

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos 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**

QUESTIONS

Action 76174

**QUESTIONS**

Operator: SAN JUAN RESOURCES, INC. 1499 Blake St, #10C Denver, CO 80202	OGRID: 20208
	Action Number: 76174
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

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