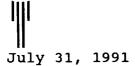


dugan production corp.





OIL CON. DIV.

Mr. Frank Chavez New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, NM 87410

Re: Dugan Production Corp.
Grand Gulch #2
Unit D, Sec. 6, T24N, R7W, NMPM
Basin Dakota Gas Pool

Rio Arriba County, New Mexico

Dear Mr. Chavez:

We are writing to request that you reclassify the captioned well from the Basin Dakota Gas Pool to the Dufers Point Gallup Dakota Oil Pool in the next general nomenclature hearing for the Aztec NMOCD office.

The Grand Gulch #2 was completed on June 11, 1982 from Dakota perforations 6941-7189' with an initial potential of 52 BOPD + 225 MCFD (GOR = 4327). With reference to Attachment No. 1, the production history for the Grand Gulch #2 is presented, and as can be seen, the performance is not typical to the Basin Dakota Gas Pool. Cumulative production as of January 1, 1991 was 10,996 BO + 12,775 MCF of gas, for an all time average producing GOR of 1162.

From August 1983 thru May 1986 gas was sold into a gas gathering system operated by Northwest Pipeline Corp. (NWPL). Since May 1986 efforts to sell gas have been discontinued because there were not sufficient volumes being produced to continue operating the compressor that was required to deliver gas into the gas sales line.

The Grand Gulch #2 is located approximately one mile to the east of the current boundary for the Dufers Point Gallup Dakota Oil Pool. Attachment No. 2 presents the current pool boundaries for the Dufers Point Gallup Dakota Oil Pool as well as Dugan Production Corp's Grand Gulch #2. I have also identified Dugan Production's Grand Gulch lease on Attachment No. 2 which comprises 504.50 acres in Section 6, T24N, R7W. The current Basin Dakota spacing unit comprises the N/2 of Section 6, and includes 344.26 acres. Our proposed reclassification from Basin Dakota to Dufers Point Gallup Dakota Oil Pool will not effect the ownership in the well (past,

present or future) since there is only one lease involved which is held 100% by Dugan Production Corp. The new spacing unit for the Grand Gulch #2 will be the NW/4 of Section 6.

Attachment No. 3 presents a summary of well and production data for five wells in the Dufers Point Gallup Dakota Oil Pool, all in the general vicinity of Dugan Production's Grand Gulch #2. As can be seen, of the five wells, three have produced significantly longer than the Grand Gulch #2, however, all five wells have exhibited similar production characteristics as has Dugan's Grand Gulch #2. It should be noted that only one of the five was initially completed in the Gallup and Dakota with four of the wells having the Gallup added subsequent to the initial completion in the Dakota. Although the Gallup has not been completed in Dugan's Grand Gulch No. 2, there appears to be similar Gallup potential as exists in the wells in the Dufers Point Gallup Dakota wells.

Attachments No. 4 and 5 present the open hole log recorded over the Gallup and Dakota horizons in Dugan's Grand Gulch #2. Attachments No. 6 and 7 present the Gallup and Dakota intervals respectively in the Nancy No. 4 well operated by BCO, Inc. (F-12-24N-8W). Attachments No. 8 and 9 present the Gallup and Dakota intervals respectively in the South Huerfano No. 1 operated by Merrion Oil and Gas (M-35-25N-8W). As can be seen by comparing the Gallup intervals and the Dakota intervals in these three wells, the Gallup and Dakota formations are similarly developed in the Grand Gulch #2 as in the two wells completed in the Dufers Point Gallup Dakota Oil Pool.

In summary, since Dugan Production's Grand Gulch #2 has exhibited production performance analogous to other wells in the Dufers Point Gallup Dakota Oil Pool and has never performed as would be expected for a well in the Basin Dakota Gas Pool, we request that Dugan's Grand Gulch #2 be included within the boundaries of the Dufers Point Gallup Dakota Oil Pool and be removed from the Basin Dakota Gas Pool.

Should you have any questions regarding this request or need additional information, please let us know.

Sincerely,

John D. Roe

folim & Rot

Engineering Manager

JDR/cg

attachs.

ATTACHMENT NO. 1

PRODUCTION SUMMARY
Dugan Production Corp.
Grand Gulch No. 2
Unit D, Sec. 6, T-24N, R-7W
Rio Arriba County, New Mexico

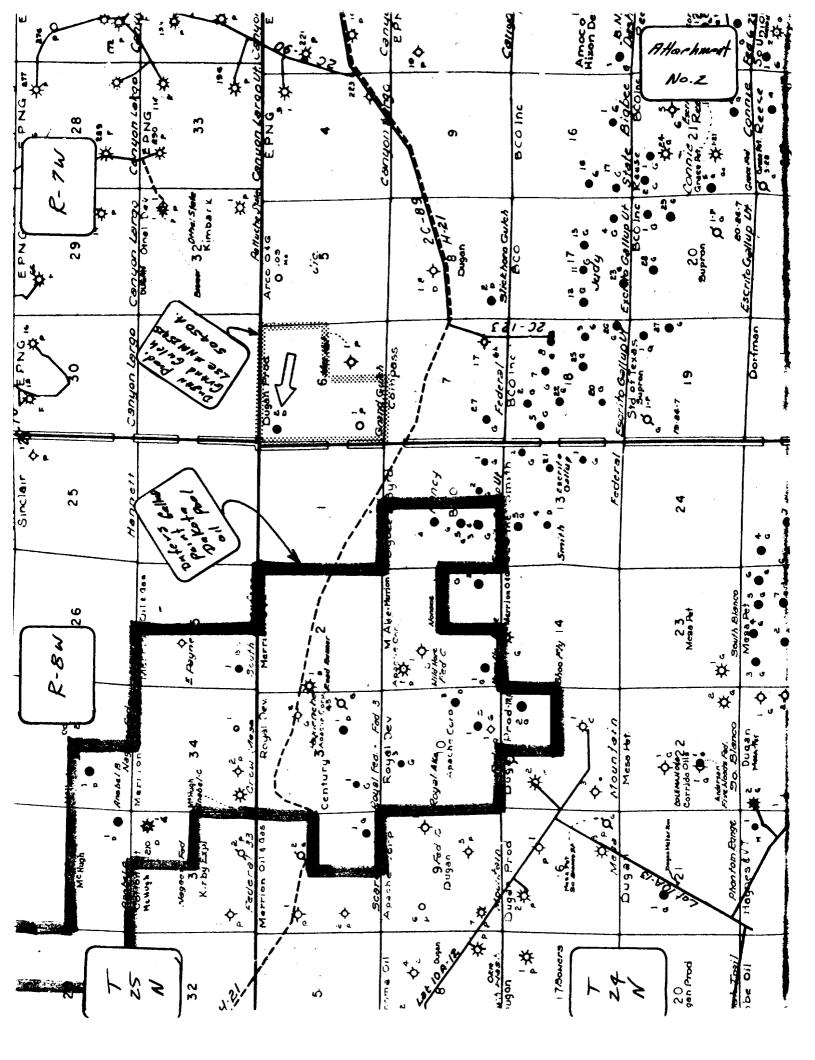
Completed: 6-11-82 Basin Dakota Gas Pool

Dakota Perfs 6941-49, 6954-58, 7179-89

Initial Potential: 52 BOPD + 225 MCFD GOR - 4327

	A1	nnual*	Mon	Monthly Average		
<u>Year</u>	BO	MCF	BO/Mo	MCF/Mo	GOR	
1982	375	597	125	349	2794	
1983	3351	4369	479	873	1825	
1984	2774	3153	231	263	1139	
1985	902	1527	150	218	1451	
1986	0	68	0	0		
1987	0	0	0	0		
1988	0	0	0	0		
1989	2321	1872	232	187	807	
1990	1273	1189	127	119	934	
Cumulative						
to 1-1-91	10,996	12,775			1162	

^{*}Production data as reported to NMOCD on form C-115.

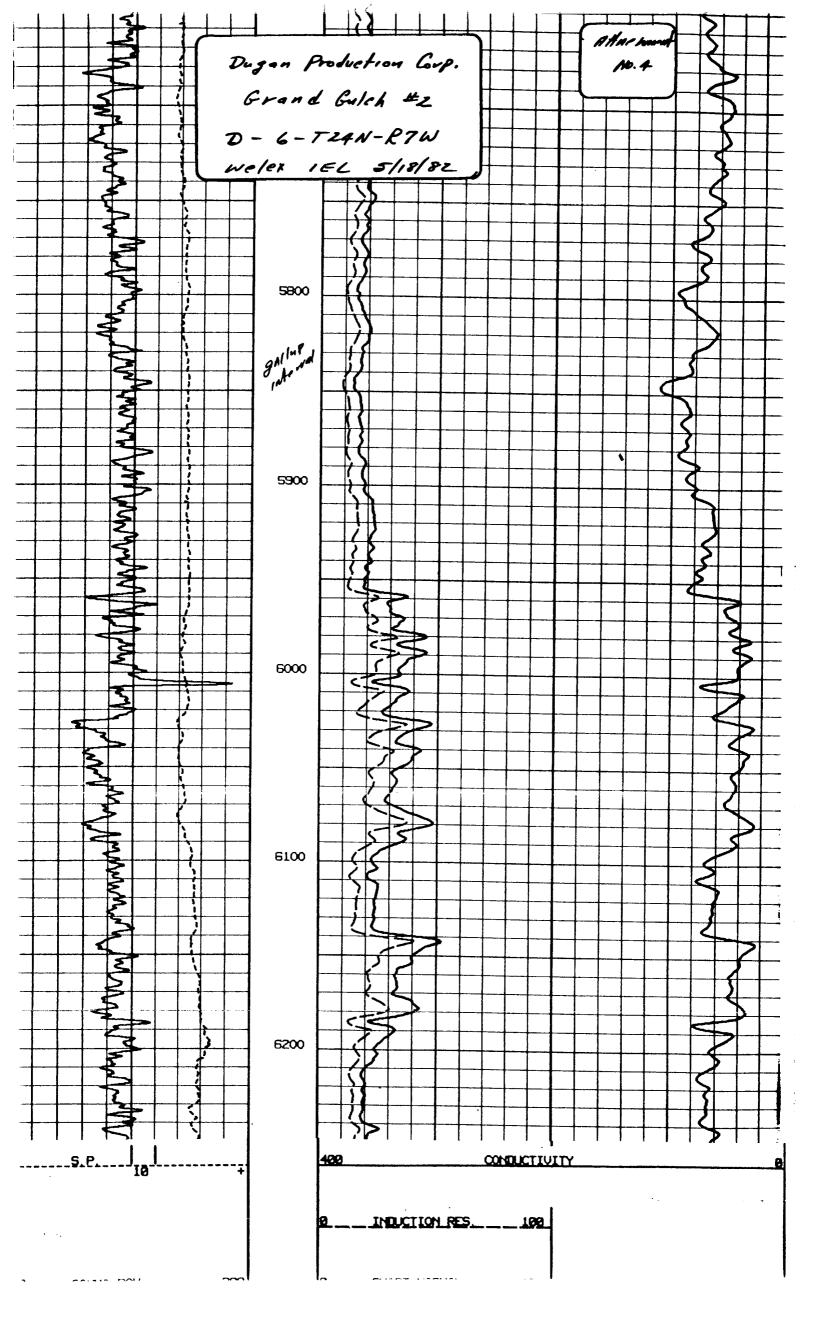


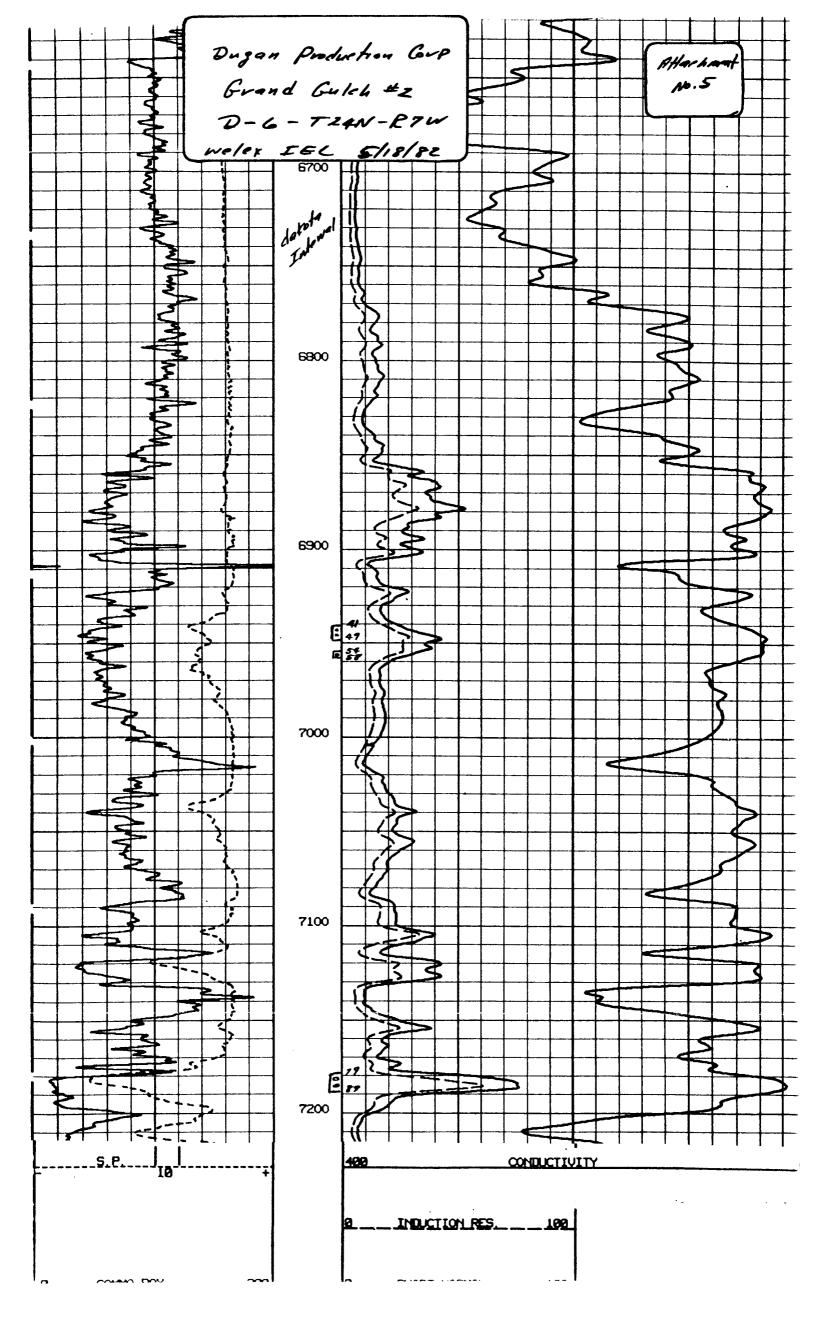
ATTACHMENT NO. 3

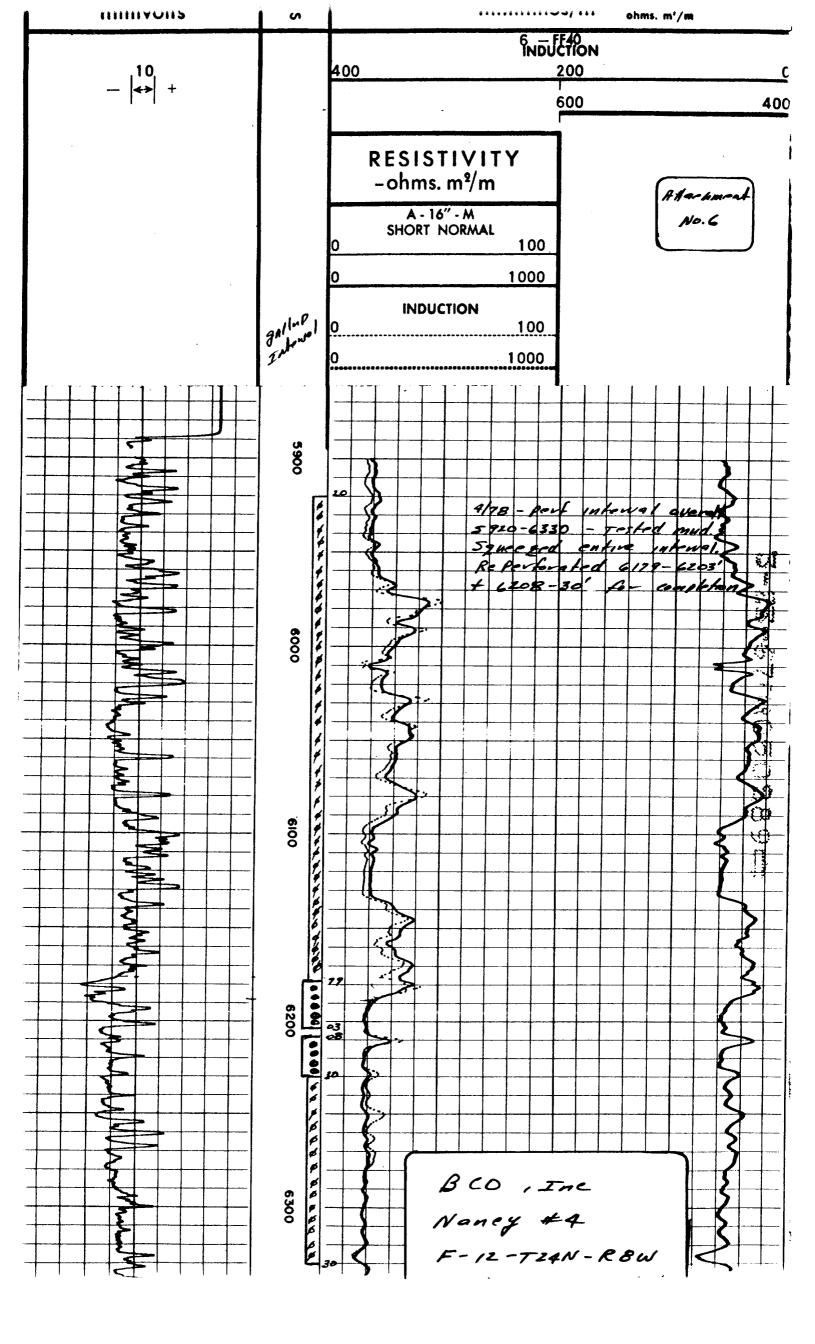
WELL DATA SUPMARY
DUFERS POINT GALLUP DAKOTA OIL POOL
Wells In Vicinity of
Dugan Production's Grand Gulch No. 2

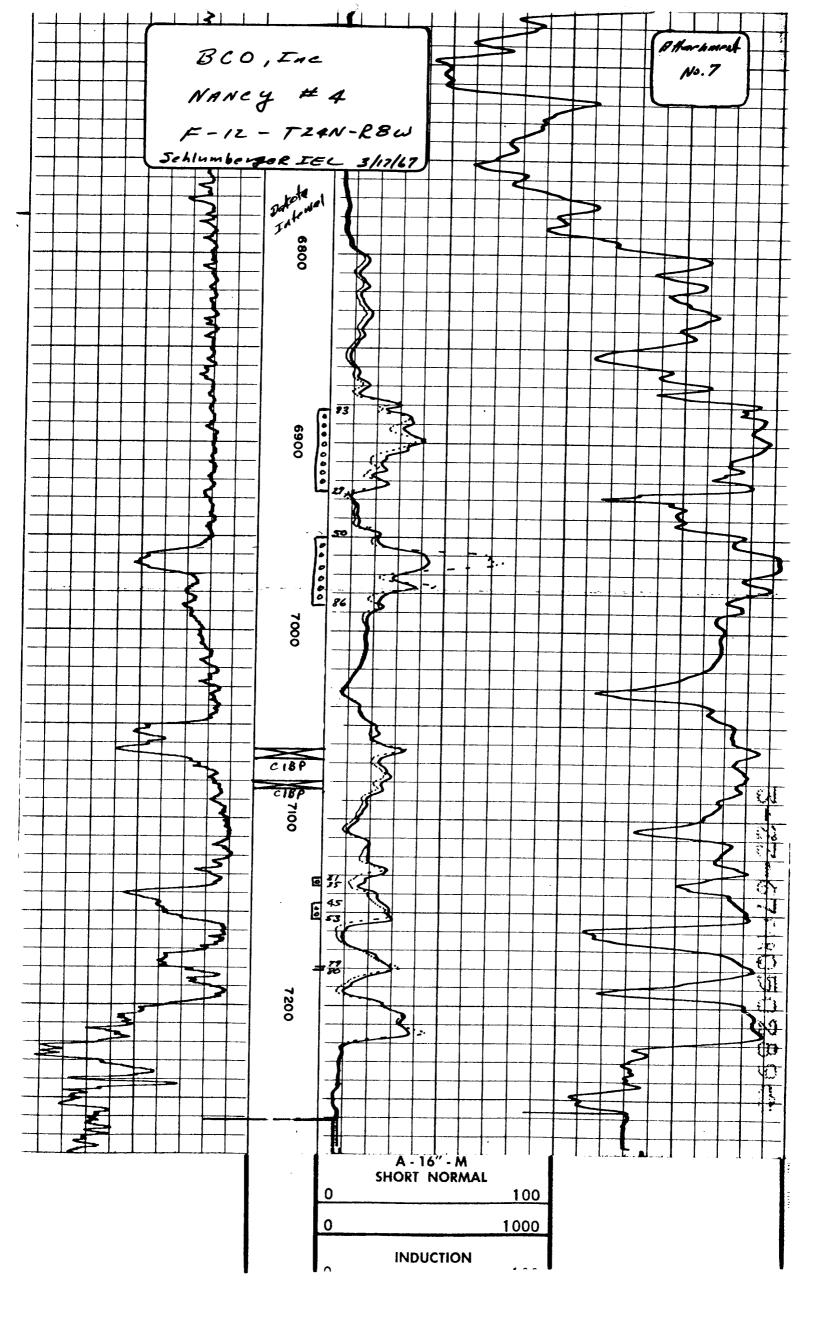
	1004		1	INITIAL POTENTIAL	114		CUMOL	CURULATIVE PRODUCTION TO 1-1-91	ICT I ON
OPERATOR & WELL NAME	U- S- T- R	DATE	200	E	808	PRODUCING HORIZON	읾	빏	S
BCO, Inc. Nancy #4	F-12-24N-8W	3-24-67	709	;	;	DK - GA added 7/78	51,796	51,796 102,601	1981
BCO, Inc. Nancy #5	K-12-24N-8W	8-20-83	92	18	2000	GA & DK	32,306	72,944	2258
BCO, Inc. Nancy #3	N-12-24N-8W	5-14-68	%	i	:	DK - GA added 6/78	40,525	669'86	2436
Merrion Oil & Gas- So.Huerfano #1	M-35-25N-8W	4-16-59	17	:	i	DK - GA added 11/76	12,668	12,509	786
Merrion Oil & Gas- Federal B #1	J-3-24N-8W	1-19-77	140	15	107	DK - GA added 1/89	21,465	49,340	550
Dugan Prod. Corp Grand Gulch #2	D-6-24N-7W	6-11-82	52	525	4327	8	10,996	12,775	1162

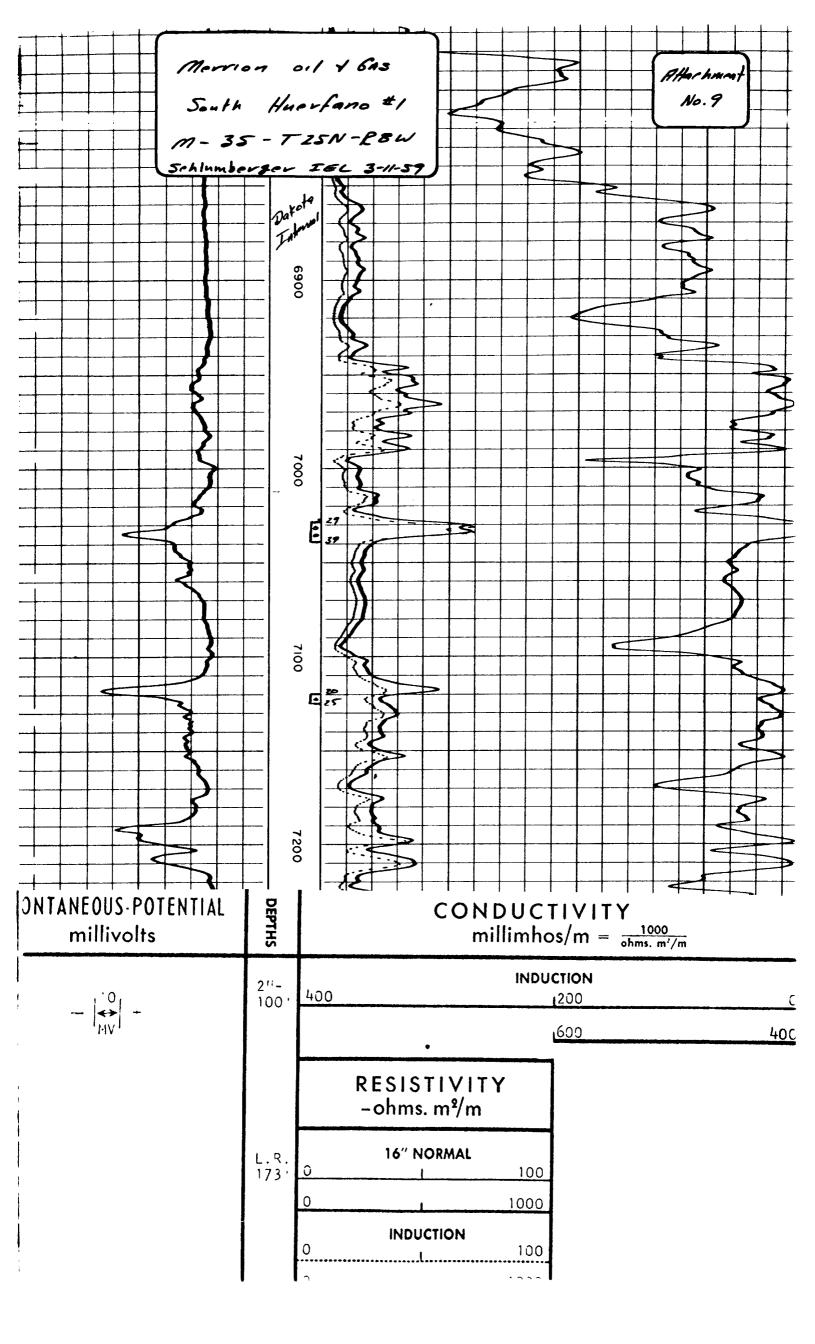
GA = Gallup DK = Dakota

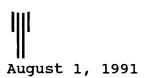












Mr. Frank Chavez New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, NM 87410

Re: Dugan Production Corp's 7-31-91
Application to Reclassify

Grand Gulch #2

Unit D, Sec. 6, T24N, R7W, NMPM Rio Arriba County, New Mexico

Basin Dakota Gas Pool to Dufers Point Gallup Dakota Oil Pool

Dear Mr. Chavez:

In the captioned application, I stated that Dugan Production owned 100% interest in the Grand Gulch lease. I am writing to correct this since Dugan Production owns 50% and Southern Union Exploration also owns 50% in both the Gallup and Dakota horizons. This change in leasehold ownership does not effect any of the content in my July 31st letter, and as stated in that letter, the reclassification from Basin Dakota to Dufers Point Gallup Dakota and the corresponding change in the spacing unit from the N/2 to the NW/4 will have no effect on the ownership in the well or production from the well past, present or future.

Please amend our July 31st application to reflect this change in working interest ownership.

Should you have any questions, please feel free to call me.

Sincerely,

for home & Roc

John D. Roe Engineering Manager

JDR/cg

cc: Southern Union Exploration, Farmington

RECEIVE D.
AUG 2 1991

OIL CON. DIV

