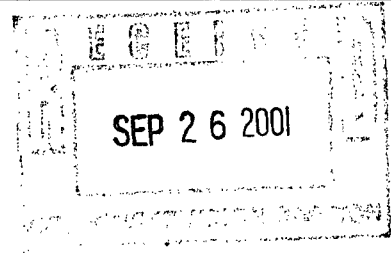


dugan production corp.



September 24, 2001

Mr. David Catanach
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Mr. Steve Henke
Bureau of Land Management-FFO
1235 La Plata Highway
Farmington, NM 87401

Re: Dugan Production's application dated 9-6-01
Surface commingling and off-lease measurement
Proposed Big Band Gas Gathering System
San Juan County, NM

Dear Mr. Catanach and Mr. Henke,

In the captioned application, eight of the nine wells were reported as being completed in the Bisti Chacra pool (Pool No. 96166) and two were completed in the Basin Fruitland Coal Pool (Pool No. 71629). Subsequent to our application, we discovered that NMOCD Order R-11445, dated 9-5-00, extended the Rusty Chacra pool (Pool No. 84360) to include the Chacra spacing units, or lands adjacent to the spacing units, for each of these eight wells. Thus what we were calling Bisti Chacra is now Rusty Chacra.

I have attached a revised Attachment No. 2 which reflects the change in pool names. Also attached are copies of revised C-102 plats for each well reflecting the change in pool names. These plats were presented as Attachment No. 3 in our application.

Please substitute the attached revised pages for those submitted with our initial application. Sorry for any inconvenience this may cause.

Should you have questions or need additional information, please let me know.

Sincerely,

John D. Roe
Engineering Manager

JDR/tmf

attachments

xc: Mr. Steve Hayden - Aztec NMOCD

ATTACHMENT NO. 2 (Revised 9-24-01) (5)
DUGAN PRODUCTION CORP.
PROPOSED BIG BAND GATHERING SYSTEM AND CDP
SAN JUAN COUNTY, NEW MEXICO

Well Name	API Number 30-045-	Well Location		Well Location		CA Number	Pool (5)	Completion Date	Current Prod. (1)			Spacing Unit
		UL-Sec-Twn-Rng	Lease No.	Lse.Type					MCFD	BC/D	BW/D	
WELLS TO BE ADDED TO SYSTEM												
Billie No. 2	23386	L-35-22N-8W	NM-8902	Federal		N/A	Rusty Chacra Ext.	1/31/81	117	0	1	SW/4-160A
Dorsey No. 1	29909	E-26-22N-8W	NM-90472	Federal		N/A	Rusty Chacra	12/1/99	100	0	1	NW/4-160A
Ellington No. 1	29907	N-26-22N-8W	NM-94067	Federal		N/A	Rusty Chacra	10/6/99	179	0	0	SW/4-160A
Goodman No. 2	29191	L-23-22N-8W	NM-90471	Federal		N/A	Rusty Chacra Ext.	1/4/95	184	0	0	SW/4-160A
Goodman No. 3 (2)	pending	I-23-22N-8W	NM-90471	Federal		N/A	Rusty Chacra	Location	100	0	0	SE/4-160A
James No. 1	29910	I-24-22N-8W	NM-93253	Federal		N/A	Rusty Chacra	12/31/99	100	0	0	SE/4-160A
James No. 2 (2)	pending	L-24-22N-8W	NM-93253	Federal		N/A	Rusty Chacra	Location	100	0	0	SW/4-160A
Zappa No. 3 (3)	29908	P-27-22N-8W	NM-57445	Federal		N/A	Rusty Chacra & Basin FR Coal	12/2/99	60	0	12	SE/4 & S/2
Zappa No. 91 (4)	29997	A-27-22N-8W	NM-57445	Federal		N/A	Basin Fruitland Coal	2/2/01	30	0	30	N/2-320A

Notes:

N/A - Not applicable or not needed.

1. Since all wells proposed for this gathering system have been shut in since completion, the production data reflects either the initial potential test or results from short term production testing subsequent to the initial completion testing. Rates for undrilled wells represent estimated initial potential.
2. APD submitted 8/8/01.
3. Zappa No. 3 was completed in the Bisti Chacra 12/2/99 with a SE/4-160A spacing unit. The Basin Fruitland Coal was perforated and fracture stimulated on 1/29/01 in conjunction with the Chacra frac job. The well is currently being production tested with the Bisti Chacra and Basin Fruitland Coal being downhole commingled (DHC-2673). The Fruitland Coal spacing unit comprises the S/2-320A and the unorthodox SE/4 Fruitland Coal completion is authorized by Administrative Order NSL-4418. Commingled gas production is allocated 50% each to the Chacra and Fruitland Coal. Commingled water production is allocated 20% Chacra and 80% Fruitland Coal. We are pumping 125-140 BWPD and gas production has increased from nothing to ±3 mcf/d and appears to be exhibiting performance typical to dewatering Fruitland Coal. We anticipate 30 to 60 mcf/d plus 6 to 12 BWPD as dewatering progresses.
4. Rod pump artificial lift equipment was installed 2/22/01 and a rate of 5 mcf/d plus 30 BWPD was tested on 6/11/01. Based upon testing to date, the performance appears to be typical for dewatering Fruitland Coal. We anticipate ±30 mcf/d as dewatering progresses.
5. The Chacra completions in all wells were initially reported to be in the Bisti Chacra Pool (NMOCD Pool No. 96166). NMOCD Order R-11445 dated 9-5-00 extended the Rusty Chacra Pool (NMOCD Pool No. 84360) to include the spacing units or lands adjacent to the spacing units for each of these wells. No other changes were made to the wells or completion intervals.

Original surveyed by Edgar L. Risenhoover
Certificate Number 3950

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WELL LOCATION AND ACREAGE DEDICATION PLAT

1 APT Number 30 045 29909		2 Pool Code 84360		3 Pool Name Rusty Chacra	
4 Property Code 015654		5 Property Name Dorsey			6 Well Number 1
7 OGRID No. 006515		8 Operator Name Dugan Production Corporation			9 Elevation 6680' Estimated

10 Surface Location

UL or lot no. E	Section 26	Township 22N	Range 8W	Lot Idn	Feet from the 1720	North/South line North	Feet from the 790	East/West line West	County San Juan
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11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
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12 Dedicated Acres 160	13 Joint or Infill	14 Consolidation Code	15 Order No.
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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

				<p>17 OPERATOR CERTIFICATION</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief</p> <p><i>John D. Roe</i></p> <p>Signature _____</p> <p>John D. Roe</p> <p>Printed Name _____</p> <p>Engineering Manager</p> <p>Title _____</p> <p>September 24, 2001</p> <p>Date _____</p>	
				<p>18 SURVEYOR CERTIFICATION</p> <p>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.</p> <p>August 3, 1994</p> <p>Date of Survey _____</p> <p>Signature and _____</p> <p>EDGAR L. RISENHOVER</p> <p>NEW MEXICO</p> <p>5979</p> <p>CERTIFICATE NUMBER _____</p>	

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WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30 045 29907		Pool Code 84360	Pool Name Rusty Chacra
Property Code 024722	Property Name Ellington		Well Number 1
OGRID No. 006515	Operator Name Dugan Production Corporation		Elevation 6722'

¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	26	22N	8W	N	1100	South	1850	West	San Juan

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

¹² Dedicated Acres 160	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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<p>16</p> <p>Section 26</p> <p>Dugan Prod. NM 94067</p> <p>1850'</p> <p>1100'</p>	<p>¹⁷ OPERATOR CERTIFICATION</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief</p> <p><i>John D. Roe</i></p> <p>Signature</p> <p>John D. Roe</p> <p>Printed Name</p> <p>Engineering Manager</p> <p>Title</p> <p>September 24, 2001</p> <p>Date</p>
	<p>¹⁸ SURVEYOR CERTIFICATION</p> <p>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.</p> <p>April 6, 1999</p> <p>Date of Survey</p> <p>Signature and Seal of Professional Surveyor</p> <p><i>Edgar J. Risen</i></p> <p>EDGAR J. RISEN NEW MEXICO 5979 PROFESSIONAL SURVEYOR</p> <p>Certificate Number</p>

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WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number 30 045 29191		2 Pool Code 84360		3 Pool Name Rusty Chacra Extension	
4 Property Code 015791		5 Property Name Goodman			6 Well Number 2
7 OGRID No. 006515		8 Operator Name Dugan Production Corporation			9 Elevation 6632 Estimated

10 Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
L	23	22N	8W		1850	South	810	West	San Juan

11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

12 Dedicated Acres 160	13 Joint or Infill	14 Consolidation Code	15 Order No.
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16				17 OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief Signature <u>John D. Roe</u> Printed Name <u>John D. Roe</u> Title <u>Engineering Manager</u> Date <u>September 24, 2001</u>	
Section 23					
		Dugan Prod. NM 90471		18 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. September 1, 1994 Date of Survey Signature and Seal of Professional Surveyor Certificate Number <u>5979</u>	

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WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number 30 045		*Pool Code 84360	*Pool Name Rusty Chacra
*Property Code	*Property Name GOODMAN		*Well Number 3
*GRID No. 005515	*Operator Name DUGAN PRODUCTION CORPORATION		*Elevation 6661'


10 Surface Location

UL or lot no.	Section	Township	Range	Lot Ion	Feet from the	North/South line	Feet from the	East/West line	County
J	23	22N	8W		1830	SOUTH	1570	EAST	SAN JUAN

11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Ion	Feet from the	North/South line	Feet from the	East/West line	County
12 Dedicated Acres 160 ACRES - (SE/4)					13 Joint or Infill		14 Consolidation Code		15 Order No.

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<div>16</div> <div>5296.50'</div> <div>5313.00'</div> <div>23</div> <div>Dugan Production Corp.</div> <div>1570'</div> <div>1830'</div> <div>NM - 90471</div> <div>5229.18'</div> <div>5334.78'</div>	<div>17 OPERATOR CERTIFICATION</div> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief</p> <p><u>John D. Roe</u> Signature John D. Roe Printed Name Engineering Manager Title September 24, 2001 Date</p> <div>18 SURVEYOR CERTIFICATION</div> <p>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.</p> <p>Date of Survey: AUGUST 29, 2001</p> <p>Signature and Seal of Professional Surveyor</p> <div></div> <p><u>JASON C. EDWARDS</u> Certificate Number 15269</p>
---	--

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WELL LOCATION AND ACREAGE DEDICATION PLAT

* API Number 30 045 29910		* Pool Code 84360	* Pool Name Rusty Chacra
* Property Code 024683	* Property Name James		* Well Number 1
* OGRID No. 006515	* Operator Name Dugan Production Corporation		* Elevation 6705'

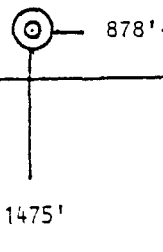
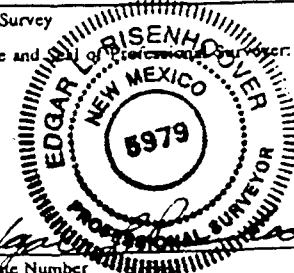
¹⁰ Surface Location

UL or lot no. I	Section 24	Township 22N	Range 8W	Lot Idn 1	Feet from the 1475	North/South line South	Feet from the 878	East/West line East	County San Juan
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¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
¹² Dedicated Acres 160	¹³ Joint or Infill	¹⁴ Consolidation Code		¹⁵ Order No.					

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<div>16</div> <div>Section 24</div> <div>Dugan Prod. NM 93253</div> <div></div>				<div>17 OPERATOR CERTIFICATION</div> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief</p> <div>John D. Roe</div> <div>Signature</div> <div>John D. Roe</div> <div>Printed Name</div> <div>Engineering Manager</div> <div>Title</div> <div>September 24, 2001</div> <div>Date</div>	
				<div>18 SURVEYOR CERTIFICATION</div> <p>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.</p> <div>April 6, 1999</div> <div>Date of Survey</div> <div>Signature and Seal of Professional Surveyor</div> <div></div> <div>Edgar L. Risenhoover</div> <div>Certificate Number</div>	

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WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number 30 045		*Pool Code 84360	*Pool Name Rusty Chacra
*Property Code	*Property Name JAMES		*Well Number 2
*OGRID No. 006515	*Operator Name DUGAN PRODUCTION CORPORATION		*Elevation 6668'

¹⁰ Surface Location

UL or lot no. L	Section 24	Township 22N	Range 8W	Lot Ion	Feet from the 1885	North/South line SOUTH	Feet from the 1000	East/West line WEST	County SAN JUAN
--------------------	---------------	-----------------	-------------	---------	-----------------------	---------------------------	-----------------------	------------------------	--------------------


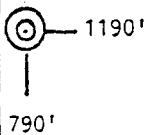
¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Ion	Feet from the	North/South line	Feet from the	East/West line	County
---------------	---------	----------	-------	---------	---------------	------------------	---------------	----------------	--------

¹² Dedicated Acres 160 ACRES - (SW/4)	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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<div><p>¹⁵</p><p>2634.72'</p><p>2640.00'</p><p>5334.78'</p><p>5347.32'</p><p>1000'</p><p>1885'</p><p>5243.70'</p><p>24</p><p>Dugan Production Corp.</p><p>NM - 93253</p></div>	<div><p>¹⁷ OPERATOR CERTIFICATION</p><p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief</p><p>Signature John D. Roe</p><p>Printed Name Engineering Manager</p><p>Title</p><p>September 24, 2001</p><p>Date</p></div> <div><p>¹⁸ SURVEYOR CERTIFICATION</p><p>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.</p><p>Date of Survey: JUNE 28, 2001</p><p>Signature and Seal of Professional Surveyor</p><div><p>JASON C. EDWARDS</p><p>NEW MEXICO</p><p>15269</p><p>REGISTERED PROFESSIONAL SURVEYOR</p></div><p>JASON C. EDWARDS</p><p>Certificate Number 15269</p></div>
---	---

16				<p>17 OPERATOR CERTIFICATION</p> <p><i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief</i></p> <p><u>John D. Roe</u> Signature</p> <p><u>John D. Roe</u> Printed Name</p> <p><u>Engineering Manager</u> Title</p> <p><u>September 24, 2001</u> Date</p>
				<p>18 SURVEYOR CERTIFICATION</p> <p><i>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.</i></p> <p><u>April 6, 1999</u> Date of Survey</p> <p>Signature and Seal of Professional Surveyor:  </p>
	Section 27			
		Dugan Prod. NM 57445		

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WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number 30 045 29997		2 Pool Code 71629		3 Pool Name Basin Fruitland Coal	
4 Property Code 013361		5 Property Name Zappa			6 Well Number 91
7 OGRID No. 006515		8 Operator Name Dugan Production Corporation			9 Elevation 6648'

10 Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
A	27	22N	8W	A	790	North	790	East	San Juan

11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

12 Dedicated Acres 320	13 Joint or Infill	14 Consolidation Code	15 Order No.
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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

16 Dugan Production NM 57445 Section 27				17 OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief Signature <u>Sherman E. Dugan</u> Printed Name Vice-President Title Date	
				18 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. September 2 Date of Survey Signature and Seal of Professional Surveyor <u>Edgar L. Risenhoger</u> 5979 Certificate Number	