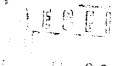


dugan production corp.





February 23, 2001

Ms. Lori Wrotenbery New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505

Re: Dugan Production's application dated 1-17-01
Proposed Surface Commingling & Off-lease Measurement
Dugan Production Corp.'s Cuccia No. 1 (API No. 30-045-10776)
Dugan Production Corp.'s Cuccia Com No. 90 (API No. 30-045-30247)
Units G & A, Section 14, T-31N, R-13W
Federal Leases 024907 & Fee Lease
Basin Dakota & Basin Fruitland Coal Gas Pools
San Juan County, NM

Dear Ms. Wrotenbery,

Attached for your consideration of the subject application are copies of the return receipts which reflect that all interest owners did receive a copy of our application. Please note that we did not receive the return card from Harold and Patricia Huggins (a royalty interest owner), however I did confirm by phone that they did receive the application and have no objection.

Also attached is a copy of the BLM's approval dated 1-29-01.

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

Sincerely,

John D. Roe

Engineering Manager

JDR/tmf

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As of 2/15/01 - We had Not Received the Return

Receipt - I called Mr. Havold Huggins at

505-325-2049 & did Confirm he had

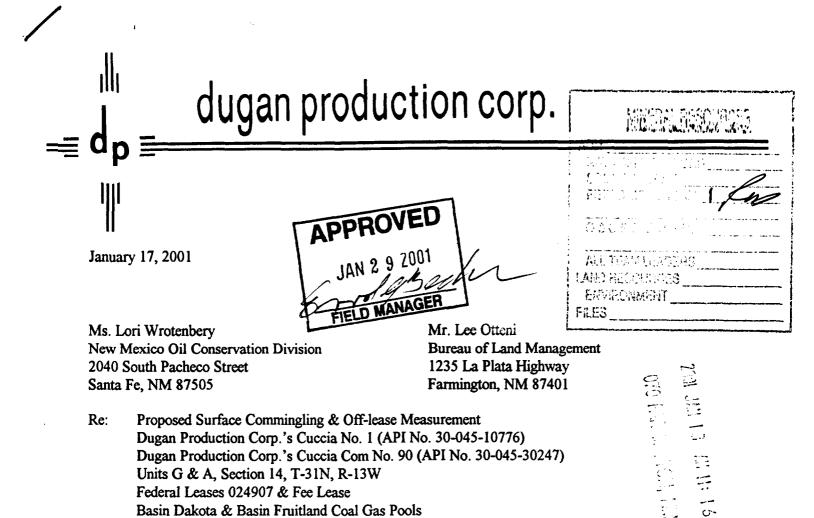
received our 1-17-01 Letter proposing the

Surface Comminging of off-lease Measurement

for Dugan's Cacin No. 1 & Curria Com No. 90 wills.

He had No oftention.

John 3 Rec 2/15/01



Dear Ms. Wrotenbery and Mr. Otteni,

San Juan County, NM

We are writing to request your approvals to surface commingle natural gas produced from the captioned wells plus the off-lease measurement for natural gas produced from the Cuccia Com No. 90. This will allow us to convert the existing natural gas sales meter for the Cuccia No. 1 (El Paso's meter no. 73286) to a central delivery sales meter (CDP) for the Cuccia No. 1 and Cuccia Com No. 90 wells. The spacing unit for each well comprises the east half (316.66 acres) of Section 14 and all interest ownership (working, royalty and overriding royalty) is common. We plan to install continuous recording dry flow meters at each well site which will provide a continuous measurement of all natural gas production from each well. These meters will be maintained to regulatory standards (currently BLM's Onshore Order No. 5) by Dugan Production and will provide the basis for determining allocation factors for the CDP sales volumes. Very little liquid hydrocarbon production is anticipated and any that does occur (along with any water production) will be separated, stored and either sold or disposed of at each well site. There will be no commingling of oil, condensate or water.

Attachment No. 1 was reproduced from the La Plata USGS Quadrangle Topography map and presents the proposed Cuccia CDP along with the subject leases and wells. Attachment No. 2 presents information for each of the wells proposed for this CDP and Attachment No. 3 presents C-102's for each well which also includes the dedicated spacing units. Dugan Production Corp. is the operator of both wells and holds 100% of the working interest. Attachment No. 4 presents the interest ownership for both wells.

The Cuccia No. 1 was completed in the Basin Dakota gas pool on 6-10-62 and had produced 450.0 mmcf of gas plus 1969 bbl condensate as of 12-1-00. The well is currently averaging 14 mcfd plus very little condensate (a total of 12 bbl during the first 11 months of 2000). The production history is presented on Attachment No. 5. This well has produced fairly marginal rates since completion and is difficult to keep producing with the small volumes of liquids (water and condensate) which tend to accumulate in the wellbore

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