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W. THOMAS KELLAHIN\*

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION  
RECOGNIZED SPECIALIST IN THE AREA OF  
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 991)

March 8, 2000

SET DE NOWO

**HAND DELIVERED**

Mr. Mark Ashley, Hearing Examiner  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, New Mexico 87505

**Re: Motion to Reopen Case 12296 for additional evidence**

*NMOCD Case No. 12296*

*Order R-8768-B*

*Application of Burlington Resources*

*Oil & Gas Company to amend Rule 7 of  
the Basin Fruitland Coal Gas Pool Rules  
New Mexico.*

Dear Mr. Ashley:

On behalf of Burlington Resources Oil & Gas Company, I have received Order R-8768-B entered effective February 10, 2000 which denied Burlington's request to relax the interior well location set back requirements for wells in this pool within the federal exploratory units.

This same issue was presented by Burlington in Case 12069 which involved the Blanco-Mesaverde Gas Pool Rules and was approved by Division Order R-10987-A, effective February 1, 1999.

It is also involved in the Basin-Dakota Gas Pool Rule changes presented by Burlington in Case 12290 on November 18, 1999 and February 17, 2000. In this case, I prepared and presented to Examiner Stogner the enclosed Memorandum to demonstrate that correlative rights are not impaired by approving this requested rule change.

Oil Conservation Division

March 8, 2000

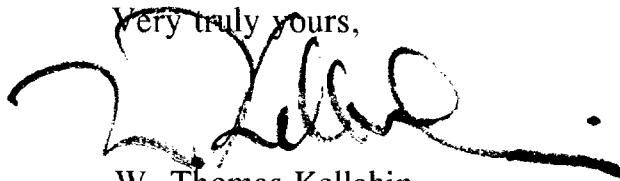
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However, in making your decision concerning the rules for the Basin Fruitland Coal Gas Pool, we did not presented you with the same opportunity. Accordingly, the purpose of this letter is to request that this case be reopened on your next available docket so that we can present additional testimony and our memorandum in support of this rule change.

In addition, I have filed an application for a DeNovo hearing to preserve Burlington's opportunity to present this issue to the Commission in the event you decide not to reopen this case.

Please let me know how you would like to proceed in addressing this issue.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', with a long horizontal flourish extending to the right.

W. Thomas Kellahin

cc: *Burlington Resources Oil & Gas Company*  
*Attn: Alan Alexander*