

GALLEGOS LAW FIRM

A Professional Corporation

460 St. Michael's Drive
Building 300
Santa Fe, New Mexico 87505
Telephone No. 505-983-6686
Telefax No. 505-986-1367
Telefax No. 505-986-0741
E-Mail glf460@spinn.net
www.gallegoslawfirm.com

August 8, 2000
(Our File No. 98-266.00)

MICHAEL J. CONDON

VIA HAND-DELIVERY

J. Scott Hall
Miller, Stratvert, Torgerson
& Schlenker, P.A.
150 Washington, Suite 300
Santa Fe, New Mexico 87501

Re: Application of Pendragon Energy Partners for Approval to Restore the
Chaco 2-R Well to Producing Status

Dear Mr. Hall:

Enclosed please find a copy of the Subpoena Duces Tecum we have submitted to the Division for issuance and service prior to any hearing on the above-referenced application. Please let me know if you will accept service of the subpoena.

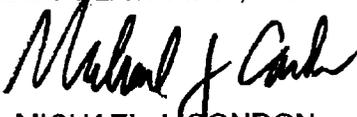
Pendragon has had some eighteen (18) months to ponder and prepare this application since the Division invited such action in its February, 1999 Order. Your Application, however, does not include a single detail as to the engineering basis of the Application. In order to have a level playing field and so that we can properly consider the Application, and so that Whiting and Maralex will have fair notice of the basis for the Application itself, we would request that you provide us and the Division with a more specific statement of the basis for the Application prior to the hearing. If such a statement is not forthcoming, we will request that the Division stay any hearing on the Application until we have an opportunity to conduct some minimal discovery so that we have an idea of the basis for the Application before we commit witnesses, and prepare exhibits for the hearing itself.

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We will look forward to hearing from you at your earliest convenience.

Your truly yours,

GALLEGOS, LAW FIRM, P.C.

BY: 
MICHAEL J. CONDON

MJC:sa

fxc: John Hazlett
Mickey O'Hare
Larry Van Ryan
Lori Wrotenbery
David Catanach
ioc: J. E. Gallegos