

KELLAHIN & KELLAHIN
Attorney at Law

W. Thomas Kellahin
New Mexico Board of Legal
Specialization Recognized Specialist
in the area of Natural resources-
oil and gas law

P.O. Box 2265
Santa Fe, New Mexico 87504
117 North Guadalupe
Santa Fe, New Mexico 87501

Telephone 505-982-4285
Facsimile 505-982-2047
tkellahin@aol.com

December 12, 2002

Via Hand Delivered and Facsimile

Ms. Lori Wrotenbery, Chairman
Oil Conservation Commission
1220 South Saint Francis Drive
Santa Fe, New Mexico 87506

**Re: Burlington Resources Oil & Gas Company and
Richardson Operating Company Objection to
San Juan Coal Company Request to Stay Division
Order R-8768-C NMOCD Case 12888 (De Novo)**

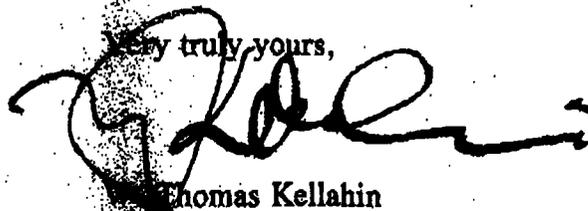
Dear Ms. Wrotenbery:

On behalf of Richardson Operating Company and Burlington Resources Oil & Gas Company, today I received by US Mail a copy of an application by San Juan Coal Company for a stay of Division Order R-8768-C which was filed with the Commission on December 5, 2002.

In violation of Division Rule 1208.A, San Juan Coal Company mailed a copy of their application rather than hand deliver or transmit it by facsimile. By doing so, San Juan Coal Company has attempted to preclude me from filing an objection before the Commission act on this application.

Accordingly, I request that the Commission set the application for hearing so that San Juan Coal Company can appear and show cause why their application should not be denied.

Very truly yours,



Thomas Kellahin

OIL CONSERVATION COM.
02 DEC 12 PM 3:35

cc: Steve Ross
Attorney for the Commission
David Brooks, Esq.
Attorneys for the Division
James Bruce, Esq.,
Attorney for San Juan Coal Company
William F. Carr, Esq.
Attorney for BP Amoco
John A. Dean, Jr. Esq.
Attorney for Dugan Production Corporation
Richardson Operating Company
Attn: David Richardson
Burlington Resources Oil and Gas Company