

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION  
FOR THE PURPOSE OF CONSIDERING:**

*See Amended*

**APPLICATION OF SAN JUAN RESOURCES, INC.  
FOR AN UNORTHODOX WELL LOCATION  
SAN JUAN COUNTY, NEW MEXICO**

**CASE NO. 14179**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by San Juan Resources, Inc. as required by the New Mexico Oil Conservation Division.

**APPEARANCES OF THE PARTIES**

**APPLICANT**

San Juan Resources, Inc.

**ATTORNEY**

W. Thomas Kellahin, Esq.  
706 Gonzales Road  
Santa Fe, NM 87501  
Phone 505-982-43285  
Fax 505-982-2047

**OPPONENT**

A. Dean Mammel  
4642 N. Versailles Ave  
Dallas Texas 75209-6016  
Ph 214-559-3317  
Fax 214-520-2845

**ATTORNEY**

### STATEMENT OF THE CASE

Applicant seeks an order authorizing the drilling and production of its Blancett Ranch "24" Well No. 1 (API No. 30-045-33769) at an unorthodox well location 2435 feet from the North line and 450 feet from the East line of Section 24, Township 30 North Range 12 West, NMPM to be dedicate to a standard 320-acre spacing unit consisting of the E/2 of this section for any production for the Basin-Dakota Gas Pool and/or the Blanco-Mesaverde Gas Pool. This administrative case has been set for hearing upon the objection of A. Dean Mammel. This well is located approximately 1/2 of a mile northwest from Flora Vista, New Mexico.

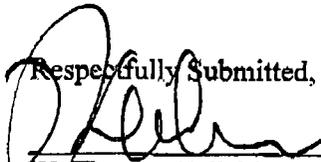
### PROPOSED EVIDENCE

WITNESSES	EST. TIME	EST. EXHIBITS
Jerry McHugh, Jr. President and owner of San Juan Resources, Inc.	10 minutes	@ 8
Petroleum Engineer to be determined	30-45 min	@ 8
Petroleum Geologist to be determined	20 min	@4

### PROCEDURAL MATTERS

None at this time

Respectfully Submitted,



W. Thomas Kellahin  
KELLAHIN & KELLAHIN

### CERTIFICATE OF SERVICE

On August 29, 2008, the undersigned cause to be delivered by facsimile a copy of this pleading to the objecting party

A. D. Mammel fax 214-520-2845



W. Thomas Kellahin