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February 26, 2010

VIA E-MAIL

Mr. Mark Fesmire, PE, Director
Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re Blancett Ranch 24 Well No. 1
 API#30-045-33769
 Unit H, E/2 of Section 24, T30N, R12W
 Application of San Juan Resources, Inc.
 for compulsory pooling and extension of
 application for permit to drill ("APD"),
 San Juan County, New Mexico

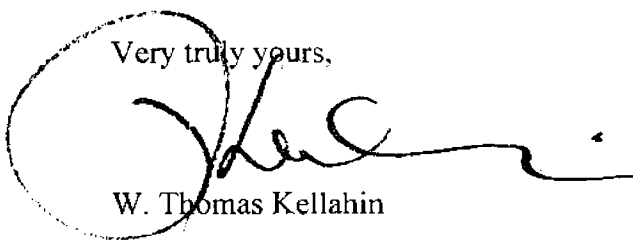
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Case 14445

Dear Mr. Fesmire:

On behalf of San Juan Resources, Inc. find enclosed our referenced application that we request be set for hearing on the Examiner's docket now scheduled for April 1, 2010. Also enclosed is our proposed advertisement of this case for the NMOCD docket.

Very truly yours,


W. Thomas Kellahin

cc: San Juan Resources

CASE 14445: Application of San Juan Resources, Inc. for compulsory pooling and extension of an application for permit to drill, San Juan County, New Mexico. Applicant seeks an order pooling all mineral interests from the base of the Pictured Cliffs formation to the base of the Dakota formation underlying a 320-acre standard spacing unit consisting of the E/2 of Section 24, T30N, R12W, NMPM, San Juan County, New Mexico, forming a standard 320-acre gas spacing and proration unit for any production from the base of the Pictured Cliffs formation to the base Dakota formation, including but not limited to the Basin-Dakota Gas Pool and Blanco-Mesaverde Gas Pool. This unit is to be dedicated its Blancett Ranch 24 Well No. 1 (API#30-045-33769) to be drilled at a previously approved (Order R-13053) unorthodox location in Unit H of this section for downhole-commingled production from the Blanco-Mesaverde Gas Pool and the Basin-Dakota Gas Pool. Also to be considered will be the costs of drilling and completion this well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of San Juan Resources, Inc. as the operator of the well and a 200% charge for risk involved in this well. In addition, applicant requests a extension of the commencement date of the wellbore to a date concurrent with the requirements of the compulsory pooling order to be entered in this case. This unit is located approximately 8-1/2 miles north from Questa, New Mexico. **IN THE ABSENCE OF OBJECTION, THIS APPLICATION WILL BE TAKEN UNDER ADVISEMENT.**

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

**IN THE MATTER OF THE APPLICATION
OF SAN JUAN RESOURCES, INC. FOR
COMPULSORY POOLING AND EXTENSION
OF A APPLICATION FOR PERMIT TO DRILL,
SAN JUAN COUNTY, NEW MEXICO.**

CASE NO. 14445

APPLICATION

San Juan Resources, Inc. ("San Juan") by its attorneys, Kellahin & Kellahin, and in accordance with Section 70-2-17.C NMSA (1978) compulsory pooling, San Juan County, New Mexico seeks an order pooling all mineral interests from the base of the pictured Cliffs formation to the base of the Dakota formation underlying a 320-acre standard spacing unit consisting of the E/2 of Section 24, T30N, R12W, NMPM, San Juan County, New Mexico, forming a standard 320-acre gas spacing and proration unit for any production from the base of the Pictured Cliffs formation to the base Dakota formation, including but not limited to the Basin-Dakota Gas Pool and Blanco-Mesaverde Gas Pool. This unit is to be dedicated its Blancett Ranch 24 Well No. 1 (API#30-045-33769) to be drilled at a previously approved unorthodox location (Order R-13053) in Unit H of this section for downhole-commingled production from the Blanco-Mesaverde Gas Pool and the Basin-Dakota Gas Pool. Also to be considered will be the costs of drilling and completion this well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of San Juan Resources, Inc. as the operator of the well and a 200% charge for risk involved in this well.

In support of its application, San Juan Resources, Inc. states:

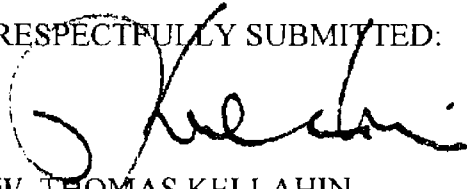
- (1) San Juan has approximately 49% percent working interest ownership in the oil and gas minerals from the base of the Pictured Cliffs Formation to the base of the Dakota formation underlying the E/2 of Section 24, T30N, R12N, NMPM, San Juan County, New Mexico.

- (2) In addition, San Juan Resources has obtained the voluntary agreement of all but approximately 12.6 % percent of the working interest owners in this gas spacing unit is located within the boundaries of the Blanco-Mesaverde Gas Pool and the Basin-Dakota Gas Pool.
- (3) About January 29, 2010, San Juan re-proposed to the other working interest or mineral owners that this well be drilled and completed in the Mesaverde and Dakota formations to be dedicated to a non-standard 320-acre gas spacing and proration unit consisting of the E/2 of Section 24.
- (4) Despite its reasonable efforts, application has been unable to obtain a written voluntary agreement from certain uncommitted working interest and/or mineral interest owners as shown on Exhibit "A"
- (5) San Juan Resources currently approved application for permit to drill this wellbore is due to expire on June 14, 2010. The Applicant requests the extension of this expiration date to a date concurrent with the requirements of the compulsory pooling order to be entered in this case.\
- (6) Pursuant to Section 70-2-17.C NMSA (1978) and in order to obtain its just and equitable share of potential production underlying this spacing unit, San Juan needs an order of the Division pooling the interest identified above in order to protect correlative rights and prevent waste.
- (7) Applicant, in the absence of timely objection, will present its evidence by affidavit as provided by Division Rule 1207.A (1) and request the 200% risk charge in accordance with Commission Order R-11992, effective August 15, 2003.
- (8) In accordance with the Division's notice requirements, a copy of this application has been sent to the parties whose interest is to be pooled as listed on Exhibit "A" notifying each of this case and of the applicant's request for a hearing of this matter before the Division on the next available Examiner's docket now scheduled for April 1, 2010.

WHEREFORE, San Juan Resources, Inc., as applicant, requests that this application be set for hearing on April 1, 2010 before the Division's duly appointed examiner, and that after notice and hearing as required by law, the Division enter its order pooling the mineral interest described in the appropriate spacing unit for this well at this approved unorthodox well location with the extension of the commencement date set forth in the "APD" and upon terms and conditions which include:

- (1) San Juan Resources, Inc. be named operator;
- (2) Provisions for applicant and all working interest owners to participate in the costs of drilling, completing, equipping and operating the well;
- (3) In the event a mineral interest or working interest owner fails to elect to participate, then provision be made to recover out of production, the costs of the drilling, completing, equipping and operating the well, including a risk factor penalty of 200%;
- (4) Provision for overhead rates per month drilling and per month operating and a provision providing for an adjustment method of the overhead rates as provided by COPAS;
- (5) For such other and further relief as may be proper.

RESPECTFULLY SUBMITTED:



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San Juan Resources, Inc.

EXHIBIT "A"

Maralex Resources, Inc.
P.O. Box 338
Ignacio, CO 81133

Union Pacific Railroad Company
c/o Farmers National Company
Attn: Ms. Samantha Morgan
5110 So Yale, Suite 400
Tulsa, Ok 74135

Georgia Lee Kelton, aka Georgia Lee Fergan,
aka Georgia Lee Bright
5500 Old Clarksville Road
Reno, TX 75462

Margery M. Krieger Revocable Trust
Ken Krieger, Trustee
209 Comanche Drive
Cheyenne, WY 82009

Ethel Alison Hueter
--address unknown--

Western Distributing Company Employees Trust
P.O. Box 5542 TA
Denver, CO 80217
Attn: Chris Boggs

Alma F. Griesedieck Testamentary Trust
The Boatman's National Bank of St. Louis, Successor Trustee
P.O. Box 14633
510 Locust Street
St. Louis, MO 63178

Eric Oftedahl, as his separate property
210 E. Main, #1S
Plano, IL 60545

Gladys A. Murphy
c/o Betty L. Spellman, attorney-in-fact
666 W. 19th Avenue, #1304
Costa Mesa, CA 92627