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

# IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISON FOR THE PURPOSE OF CONSIDERING:

# APPLICATION OF SAN JUAN RESOURCES, INC. FOR COMPULSORY POOLING SAN JUAN COUNTY, NEW MEXICO

**CASE NO. 14464** 

## **PRE-HEARING STATEMENT**

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

## **APPEARENCES OF THE PARTIES**

## APPLICANT

## ATTORNEY

San Juan Resources, Inc.

W. Thomas Kellahin, Esq. 706 Gonzales Road Santa Fe, NM 87501 Phone 505-982-43285 Fax 505-216-2780

#### **OPPONENT**

## ATTORNEY

NONE

# STATEMENT OF THE CASE

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 W/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

NMOCD Case 14464 San Juan Resources, Inc. First Amended Prehearing Statement Page 1 be dedicated its Monarch Crest 24 Well No. 1 (API#30-045-34770) to be drilled at a previously approved unorthodox location in Unit C 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 THE ABSENCE OF OBJECTION, THIS APPLICATION WILL BE TAKEN UNDER ADVISEMENT.

#### PROPOSED EVIDENCE

# WITNESSES EST. TIME EST. EXHIBITS

BY AFFIDVIT the testimony for Jerry McHugh. Jr. President and owner of San Juan Resources, Inc.

5-10 minutes

(a) 4

## **PROCEDURAL MATTERS**

None

Respectfully Submitted,

W. Thomas Kellahin KELLAHIN & KELLAHIN

#### **CERTIFICATE OF SERVICE**

On April 22, 2010, the undersigned cause to be delivered by email a copy of this pleading to all counsel of record:

David K Brooks, Esq.	OCD attorney for Examiner	
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	W. Thomas Kellahin	

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