

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:

APPLICATION OF SAN JUAN RESOURCES, INC.
FOR COMPULSORY POOLING AND DOWNHOLE
COMMINGLING, SAN JUAN COUNTY, NEW MEXICO.


No. 12796

ENTRY OF APPEARANCE
and
PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Frank King as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

San Juan Resources, Inc.

APPLICANT'S ATTORNEY

W. Thomas Kellahin

OTHER PARTY

Frank King
4580 Belfort Place
Dallas, Texas 75205
(214) 891-2503

OTHER PARTY'S ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

STATEMENT OF THE CASE

APPLICANT

OTHER PARTY

Mr. King is an interest owner in the well unit whose rights are limited in depth from the surface to the top of the Dakota formation. The proposed well will test the Dakota formation. Because of the depth severance, Mr. King will request the Division to consider matters including (1) allocation of well costs between the zones and interest owners, and (2) accurate allocation of production between zones if production from the well is downhole commingled. In addition, Mr. King will request that the non-consent penalty be reduced below 200%.

PROPOSED EVIDENCEAPPLICANTWITNESSESEST. TIMEEXHIBITSOTHER PARTYWITNESSESEST. TIMEEXHIBITS

Frank King (possible)

PROCEDURAL MATTERS

-None-

Respectfully submitted,



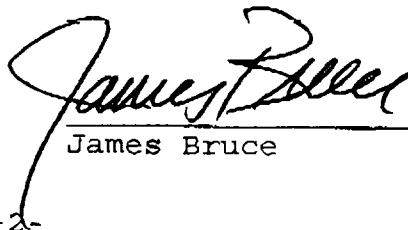
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Attorney for Frank King

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record via facsimile transmission this 17th day of January, 2002:

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