

Techsys Resources, LLC  
PO Box 19465  
Houston, TX 77224

## facsimile transmittal

To: Mr. David K. Brooks      Fax: 505 476 3462  
From: Brad Bliss      Date: 1/29/2009  
Re: Case No. 14271      Pages: 4 (including cover page)  
CC: Mr. James Bruce (Attorney for  
Vanguard Permian, LLC)

☒ Urgent    ☐ For Review    ☐ Please Comment    ☐ Please Reply    ☐ Please Recycle

Dear Mr. Brooks,

Please find attached a pre-hearing statement and a motion for continuance each addressed to the Oil Conservation Division. The documents refer to Case No. 14271.

If you have any questions or need further information, please give me a call at (713) 805 - 5125.

Sincerely,



Brad Bliss

**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 VANGUARD PERMIAN, LLC  
FOR A NON-STANDARD GAS SPACING AND  
PRORATION UNIT AND AN UNORTHODOX GAS  
WELL LOCATION, LEA COUNTY, NEW MEXICO.**

**Case No. 14271**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Techsys Resource, LLC as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

**APPLICANT'S ATTORNEY**

**OPPONENT**

Techsys Resources, LLC  
PO Box 19465  
Houston, Texas 77024

**OPPONENT'S ATTORNEY**

[yet to be determined]

Attention: Brad Bliss  
(713) 984-8326

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks an order approving a non-standard gas spacing and proration unit in the Queen formation (Byers-Queen Gas Pool) comprised of the N $\frac{1}{2}$ NE $\frac{1}{4}$  of Section 32, Township 18 South, Range 38 East, NMPM, and an unorthodox gas well location in the Queen formation for the State A Well No. 7, located 760 feet from the north line and 500 feet from the east line of Section 32.

WVS 1/29/09

OPPONENT

Techsys Resources, LLC seeks order rejecting approval of Applicant's request for a non-standards gas spacing and proration unit in the Queen formation (Byers-Queen Gas Pool) comprised of the N½NE¼ of Section 32, Township 18 South, Range 38 East, N10W, and an unorthodox gas well location in the Queen formation for the State A Well No. 7, located 760 feet from the north line and 500 feet from the east line of Section 32.

**PROPOSED EVIDENCE**APPLICANTOPPONENTWITNESSESEST. TIMEEXHIBITS

Brad Bliss -- Owner  
Paul Bliss -- Engineer

15 min. to 20 min.  
15 min

Approx. 5 - 10  
Approx. 5

Sincerely,



Brad Bliss, President

Techsys Resources, LLC  
PO Box 19465  
Houston, TX 77224

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**MOTION FOR CONTINUANCE**

COMES NOW Techsys Resources, LLC, and states the following:

1. This matter is scheduled for hearing on February 5, 2009;
2. First and only notice of hearing was received by mail on February 26, 2009 only four days before the pre-hearing statement must be filed;
3. Additional time is needed to:
  - a. Review procedural requirements and hire an attorney for necessary procedural representation,
  - b. Prepare necessary evidence and/or exhibits,
  - c. Receive and review copies of APPLICANT'S pre-hearing statement and evidence.
4. A continuance is respectfully requested until the next available date for hearing any time after February 9th, 2009.

A copy of this request for continuance has been faxed to Mr. James Bruce, Attorney for Vanguard Permian, LLC on January 29, 2009.

WHEREFORE, I respectfully request a continuance of this hearing, and for all other just or proper relief. I affirm that the foregoing representations are true.

  
\_\_\_\_\_  
Brad D. Bliss, President  
Techsys Resources, LLC  
PO Box 19465  
Houston, TX 77224

WAT 1/29/09