

**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. 14,271**

**AMENDED PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Vanguard Permian LLC  
Suite 485  
7700 San Felipe  
Houston, Texas 77063

Attention: Britt Pence  
(832) 327-2241

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

Techsys Resources, LLC  
P.O. Box 19465  
Houston, Texas 77224

Attention: Brad Bliss  
(713) 984-8326

**OPPONENT'S ATTORNEY**

*JB*  
*3/16/09*

**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.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Britt Pence  
(engineer)

20 min.

Approx. 8

\_\_\_\_\_  
(geologist)

15 min.

Approx. 3

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

Respectfully submitted,



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

Attorney for Vanguard Permian, LLC

cc: Brad Bliss (via e-mail)

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**MOTION FOR CONTINUANCE**

Vanguard Permian LLC moves the Division for a continuance of this case, and in support thereof, states:

1. This matter is scheduled for hearing on March 19, 2009.
2. Applicant's primary witness, Britt Pence, is unable to be in Santa Fe on March 19, 2009.
3. As result, applicant requests that this matter be continued to the March 31, 2009 hearing.
4. Applicant requested the concurrence of Techsys Resources, LLC to this motion, but has not received a response to the request.

WHEREFORE, applicant requests a continuance of the hearing to March 31, 2009.

Respectfully submitted,



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

Attorney for Vanguard Permian, LLC

cc: Techsys Resources, LLC (via e-mail)

*Jt 3/16/09*