

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)	

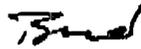
Urgent
 For Review
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Dear Mr. Brooks,

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 - 5225.

Sincerely,



Brad Bliss

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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, 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.

PROPOSED EVIDENCE

APPLICANT

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

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

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

**IN THE MATTER OF THE HEARING CALLED
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MOTION FOR CONTINUANCE

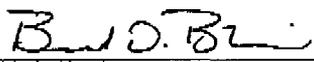
COMES NOW Techsys Resources, LLC, and states the following:

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.

WAT 1/29/09

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