

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:

CASE NO. 10831

APPLICATION OF ROBERT L. BAYLESS  
FOR DOWNHOLE COMMINGLING,  
RIO ARRIBA COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This prehearing statement is submitted by Robert L. Bayless as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Robert L. Bayless

Tommy Roberts

P.O. Box 168

P.O. Box 1020

Farmington, New Mexico 87499

Farmington, New Mexico 87499

Attn: Kevin H. McCord

505/325-1801

505/326-2659

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OPPOSITION OR OTHER PARTY

ATTORNEY

Not Known

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STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with the application and the reasons therefore.)

Applicant seeks an order of the Oil Conservation Division approving the downhole commingling of gas production from the Cabresto-Gallup Gas Pool and the East Blanco-Pictured Cliffs Gas Pool within the wellbore of its Simms Com No. 1 Well located in the NW/4SE/4 of Section 13, Township 30 North, Range 4 West, N.M.P.M., Rio Arriba County, New Mexico. The basis for this application is economics.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

NOT APPLICABLE

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Kevin H. McCord - Petroleum Engineer	20 min.	- Lease Ownership Plat - One Point Back Pressure Test (Gallup) - One Point Back Pressure Test (PC) - Summary of Gas Analysis - Allocation Formula - Administrative Application

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
NOT APPLICABLE		

PROCEDURAL MATTERS  
(Please identify any procedural matters which  
need to be resolved prior to the hearing)

NONE

*Tommy Roberts*

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TOMMY ROBERTS, Attorney for  
Robert L. Bayless

DATED: September 15, 1993

LAW OFFICES

**TANSEY, ROSEBROUGH, GERDING & STROTHER, P.C.**

621 WEST ARRINGTON OIL CONSERVATION DIVISION  
FARMINGTON, NEW MEXICO 87401 RECEIVED  
TELEPHONE: (505) 325-1801

'93 SEP 21 AM 9 34

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(505) 325-4675

OF COUNSEL  
Charles M. Tansey

Douglas A. Echols  
Richard L. Gerding  
Michael T. O'Loughlin  
James B. Payne  
Tommy Roberts  
Haskell D. Rosebrough  
Robin D. Strother  
Karen L. Townsend

Mailing Address:  
P. O. Box 1020  
Farmington, N.M. 87499

September 16, 1993

State of New Mexico  
Energy, Minerals and Natural  
Resources Department  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87501-2088

Attn: William J. Lemay, Director

Re: Application of Robert L. Bayless for Downhole Commingling, Rio Arriba County, New  
Mexico  
Case No. 10831

Dear Mr. Lemay:

Enclosed please find Applicant's Pre-Hearing Statement in the above-referenced matter.

Sincerely,

  
Tommy Roberts

TR:mkc  
Encl.

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
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Attn: Kevin H. McCord

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OPPOSITION OR OTHER PARTY

ATTORNEY

Not Known

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Pre-hearing Statement  
NMOCD Case No. 10831  
Page 2

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NOT APPLICABLE

Pre-Hearing Statement  
NMOCD Case No. 10831  
Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

Kevin H. McCord  
- Petroleum Engineer

20 min.

- Lease Ownership Plat
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- One Point Back Pressure Test (PC)
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- Administrative Application

OPPOSITION

WITNESSES  
(Name and expertise)

EST. TIME

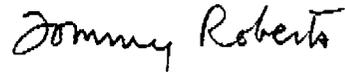
EXHIBITS

NOT APPLICABLE

Pre-Hearing Statement  
NMOCD Case No. 10831  
Page 4

PROCEDURAL MATTERS  
(Please identify any procedural matters which  
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NONE



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TOMMY ROBERTS, Attorney for  
Robert L. Bayless

DATED: September 15, 1993



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

November 2, 1993

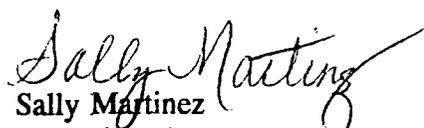
TANSEY, ROSEBROUGH, GERDING  
& STORTHER  
Attorneys at Law  
P. O. Box 1020  
Farmington, New Mexico 87499

RE: CASE NO. 10831  
ORDER NO. R-10008

Dear Sir:

Enclosed herewith are two copies of the above-referenced Division order recently entered in the subject case.

Sincerely,

  
Sally Martinez  
Administrative Secretary

cc: Aztec OCD Office  
BLM Farmington Office  
Tom Kellahin