



## OIL & GAS ADMINISTRATION

JICARILLA APACHE NATION

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18 January 2018

David R. Catanach, Director  
NM Oil Conservation Division  
1220 S St Francis Drive  
Santa Fe, NM 87505

RE: CASE NO. 15946, Jicarilla Oil and Gas Administration, Prehearing Statement

Name of Party:

The Jicarilla Oil & Gas Administration (JOGA), acting on behalf of the Jicarilla Apache Nation (Nation) and represented by Mr. Guillermo DeHerrera, Director JOGA is hereby submitting the following prehearing statement in reference to CASE NO. 15946; APPLICATION OF ROBERT L. BAYLESS, PRODUCER LLC FOR APPROVAL OF LA JARA MANCOS UNIT, CREATION OF A NEW POOL FOR HORIZONTAL DEVELOPMENT WITHIN THE UNIT AREA, AND FOR ALLOWNCE OF 660 FOOT SETBACKS FROM THE EXTERIOR OF THE PROPOSED UNIT, RIO ARRIBA COUNTY, NEW MEXICO.

Position Statement:

The JOGA opposes the creation of this unit for the following reasons; 1) The Nation was not provided sufficient information prior to this application to determine whether the proposed unit would cause harm to the Nation's interests, 2) The Nation was not provided a development plan which would include horizontal lateral lengths and directions, 3) The Nation is concerned that drainage of hydrocarbons from the adjacent Nation lands may occur with the 660 foot setback.

Witnesses:

The Nation will be represented by Mr. Guillermo DeHerrera, Director of the Jicarilla Oil & Gas Administration. In accordance with NMAC 19.15.4.13, witness is providing a sworn and notarized statement attesting that the Jicarilla Apache Nation President has authorized Guillermo DeHerrera, Director of JOGA to represent the Nation this matter. The approximate time needed for the Nation to state their case is 20 minutes.

Procedural Matters: None

With Kind Regards,

A handwritten signature in blue ink, appearing to read "Guillermo DeHerrera".

Guillermo DeHerrera, Director  
Director of Jicarilla Oil and Gas Administration (JOGA)  
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Cc: Elizabeth A. Ryan