

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

**APPLICATION OF SAN JUAN RESOURCES, INC.  
FOR APPROVAL OF THE MCSIMMS UNIT AND  
FOR ALLOWANCE OF 330 FOOT SETBACKS  
FROM THE BOUNDARY OF THE UNIT,  
RIO ARriba COUNTY, NEW MEXICO.**

**CASE NO. 16,035**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Robert L. Bayless, Producer LLC ("Bayless")  
as required by 19.15.4.13.B NMAC.

**APPEARANCES**

**INTERESTED PARTY**

Robert L. Bayless, Producer LLC

**ATTORNEY**

Elizabeth A. Ryan  
Carson Ryan LLC  
P.O. Box 1612  
Roswell, NM 88202  
(575) 291-7606  
beth@carsonryan.com

Bayless' La Jara Unit borders the boundary of Applicant's proposed unit. Bayless protests Applicant's request for 330-foot setbacks from the outer boundary of the proposed unit and protests its request for exception to the Special Rules for the Basin Mancos Gas Pool (97232) adopted under Order R-12984 which instead sets 660-foot setbacks.

**BAYLESS' PROPOSED EVIDENCE**

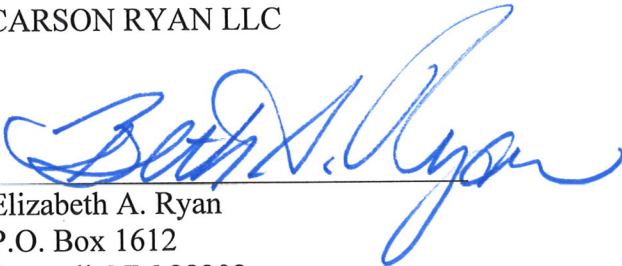
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
John Thomas, Production & Assets Manager	Approximately 20 minutes	Approximately 2 Exhibits
Cranford Newell, Land Manager	Approximately 10 minutes	Approximately 1 Exhibit

**PROCEDURAL MATTERS**

Not at this time.

Respectfully submitted,

CARSON RYAN LLC



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*Attorneys for Robert L. Bayless, Producer LLC*