

**AFFIDAVIT**

STATE OF NEW MEXICO §  
COUNTY OF SAN JUAN §

PAUL HALL, being first sworn, states as follows:

1. I am the Land Manager for Robert L. Bayless, Producer LLC and handle, on request, all land work for Robert L. Bayless, individually, or other Bayless' Companies required land work.

2. I was responsible for preparing all submittals associated with the Compulsory Pooling for the Hun Nop Pi # 2 Well which is to be located in the NW/4 of Section 19, Township 26 North, Range 8 West, San Juan County, New Mexico and hereby attest to the best of my knowledge and belief that all information submitted is complete and correct.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
Paul Hall

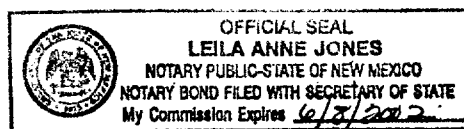
STATE OF NEW MEXICO §  
COUNTY OF SAN JUAN §

The foregoing instrument was acknowledged before me this 16<sup>th</sup> day of January, 2001.

My commission expires:

June 8, 2002

  
\_\_\_\_\_  
Notary Public



**ROBERT L. BAYLESS, PRODUCER**

P. O. BOX 168  
FARMINGTON, NM 87499

FAX NO.  
(505) 326-6911

OFFICE NO.  
(505) 326-2659

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January 22, 2001

Ms. Lori Wrotenbery, Director  
**NEW MEXICO OIL  
CONSERVATION DIVISION**  
2040 S. Pacheco Street  
Santa Fe, NM 87505

RE: NMOCD Case No. 12557  
REQUEST FOR CONTINUANCE of  
Application for Compulsory Pooling  
Robert L. Bayless, Operator  
Hun Nop Pi # 2 Well  
W/2 Sec. 19-T26N-R8W  
San Juan County, NM

Dear Ms. Wrotenbery:

Due to continued medical concerns in the immediate family of Mr. Bayless, we respectfully request a continuance of NMOCD Case No. 12557. We further request that such Case be rescheduled for hearing on February 22<sup>nd</sup>, 2001.

Should you have any questions, I may be contacted at (505) 564-7806.

Yours truly,



Paul Hall, CPL/ESA  
Land Manager

cc: Non-committed working interest owners

P. O. BOX 168, FARMINGTON, NM 87499  
PHONE (505) 326-2659 FAX (505) 326-6911

**ROBERT L. BAYLESS,  
PRODUCER LLC**

# Fax

To:	Ms. Lori Wrotenbery, Director	From:	Paul Hall
Fax:	(505) 476-3462		
Phone:		Date:	1/22/01
Re:	Hearing NMOCD Case NO 12557	Pages:	Two (2) including cover sheet

✓ **FOR YOUR REVIEW**

**ROBERT L. BAYLESS, PRODUCER**

P. O. BOX 168  
FARMINGTON, NM 87499

FAX NO.  
(505) 326-6911

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(505) 326-2659

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January 9, 2001

Ms. Lori Wrotenberg, Director  
**NEW MEXICO OIL  
CONSERVATION DIVISION**  
2040 S. Pacheco Street  
Santa Fe, NM 87505

RE: NMOCD Case No. 12557  
REQUEST FOR CONTINUANCE of  
Application for Compulsory Pooling  
Robert L. Bayless, Operator  
Hun Nop Pt # 2 Well  
W/2 Sec. 19-T26N-RSW  
San Juan County, NM

Dear Ms. Wrotenberg:

We wish to reconfirm the continuance of NMOCD Case No. 12557. The scheduled Case is now set for hearing on January 25<sup>th</sup>, 2001.

Should you have any questions, I may be contacted at (505) 564-7806.

Yours truly,



Paul Hall, CPL/ESA  
Land Manager

cc: Non-committed working interest owners

NAME	CERTIFIED2
JAMES H. ANDERSON 2713 107TH SE BEAUX ARTS, WA 98004	7099 3400 0018 4212 9904
WILLIAM R. ANDERSON 2139 ELMWOOD AVENUE WILMETTE, IL 60091	7099 3400 0018 4212 9898
ESTATE OF DOROTHY DeGOLYER ARNOLD % DOUGLAS DeGOLYER ARNOLD 638 MORENO ROAD PENN VALLEY, PA 19077	7099 3400 0018 4212 9881
BARBARA ANN McCONNELL BRUSS McCONNELL LLC 67428 OAK LEAF MONTROSE, CO 81401	7099 3400 0018 4212 9874
ELLA NORA ANDERSON DENNY 7379 SE 71ST STREET MERCER ISLAND, WA 98040	7099 3400 0018 4212 9867
MS. JANET WOOLDRIDGE DEVON ENERGY CORP. 20 N. BROADWAY AVENUE, SUITE 1500 OKLAHOMA CITY, OK 73102	7099 3400 0018 4212 9850
MS. EVA WHITEN HALL ENERGY CO. , LLC 101 PARK AVENUE, SUITE 1010 OKLAHOMA CITY, OK 73102	7099 3400 0018 4212 9843
BARBARA IRENE McCONNELL TESTAMENTARY TRUST 67428 OAK LEAF MONTROSE, CO 81401	7099 3400 0018 4212 9836
ESTATE OF VIRGINIA DeGOLYER MAXSON % MARY MAXSON THOMPSON 555 REPUBLIC DR, SUITE 200 PLANO, TX 75074	7099 3400 0018 4212 9829
MARJORIE ANDERSON PELTO P. O. BOX 10701 BAINBRIDGE ISLAND, WA 98110	7099 3400 0018 4212 9812
MR. J. E. GALLEGOS GALLEGOS LAW FIRM, A PROFESSIONAL CORPORATION 460 ST. MICHAELS DRIVE, BUILDING 300 SANTA FE, NM 887505	7099 3400 0018 4212 9805
	Notification of new hearing date. Sent 1/9/01

**ROBERT L. BAYLESS, PRODUCER**

P. O. BOX 163  
FARMINGTON, NM 87499

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(505) 326-2659

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December 15, 2000

Ms. Lori Wrotenbery, Director  
**NEW MEXICO OIL  
CONSERVATION DIVISION**  
2040 S. Pacheco Street  
Santa Fe, NM 87505

RE: NMOCD Case No. 12557  
REQUEST FOR CONTINUANCE of  
Application for Compulsory Pooling  
Robert L. Bayless, Operator  
Hun Nop Pi # 2 Well  
W/2 Sec. 19-T26N-R8W  
San Juan County, NM

Dear Ms. Wrotenbery:

Due to a medical emergency in the immediate family of Mr. Bayless, we respectfully request a continuance of NMOCD Case No. 12557. We further request that such Case be rescheduled for hearing on January 25<sup>th</sup>, 2001.

Should you have any questions, I may be contacted at (505) 564-7806.

Yours truly,



Paul Hall, CPL/ESA  
Land Manager

cc: Non-committed working interest owners

P. O. BOX 168, FARMINGTON, NM 87499  
PHONE (505) 326-2659 FAX (505) 326-6911

**ROBERT L. BAYLESS,  
PRODUCER LLC**

# Fax

To: Lori Wrotenbery, Director

From: Paul Hall

Fax: 505-827-8177

Phone:

Date: 12/15/00

Re: Case No. 12557

Pages: Two (2) including cover

✓ **FOR YOUR REVIEW**

Request for Continuance of Application for Compulsory Pooling

**ROBERT L. BAYLESS, PRODUCER**

P. O. BOX 168  
FARMINGTON, NM 87499

FAX NO.  
(505) 326-6911

OFFICE NO.  
(505) 326-2659

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December 13, 2000

Ms. Lori Wrotenbery, Director  
**NEW MEXICO OIL  
CONSERVATION DIVISION**  
2040 S. Pacheco Street  
Santa Fe, NM 87505

RE: Case No. 12557  
Pre-Hearing Statement  
for Compulsory Pooling  
Robert L. Bayless, Operator  
Hun Nop Pi # 2 Well  
W/2 Sec. 19-T26N-R8W  
San Juan County, NM

Dear Ms. Wrotenbery:

Enclosed is a Pre-Hearing Statement for the compulsory pooling under the above described Well.  
Should you have any questions, I can be contacted at (505) 326-2659.

Yours truly,

Paul Hall, CPL/ESA  
Land Manager



**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. 12557

APPLICATION OF ROBERT L. BAYLESS FOR  
COMPULSORY POOLING, SAN JUAN  
COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Robert L. Bayless as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Robert L. Bayless – Pro Se .

\_\_\_\_\_

P. O. box 168 .

\_\_\_\_\_

Farmington, NM 87499 .

\_\_\_\_\_

Phone (505) 326-2659 .

\_\_\_\_\_

OPPOSITION OR OTHER PARTY

ATTORNEY

Not known .

Not known .

\_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_

## STATEMENT OF CASE

### APPLICANT

Applicant seeks an order of the Oil Conservation Division force-pooling all mineral interests from the base of the Pictured Cliffs formation to the base of the Dakota formation underlying the W/2 of Section 19, Township 26 North, Range 8 West, San Juan County, New Mexico, forming a standard, standup 320-acre (more or less) proration unit to be dedicated to the Hun Nop Pi No. 2 Well to be drilled at a standard gas well location.

Applicant also seeks to be designated as the operator of the Well and that he and other joining working interest owners be authorized to recover the costs of drilling, completing, equipping, and operating the Well, together with an additional 200 % charge for risk associated with the drilling and completion of the Well.

Applicant further requests that he be allowed a reasonable charge for the supervision of the Well during drilling and production stages.

Efforts to obtain the voluntary joinder of certain owners of leasehold operating rights have been unsuccessful.

### OPPOSITION OR OTHER PARTY

We are unaware of any parties opposing this application.

PROPOSED EVIDENCE

APPLICANT

WITNESSES  
ROBERT L. BAYLESS

EST. TIME  
30 minutes

EXHIBITS  
Exhibit "A"  
Lease ownership plat  
Exhibit "B"  
Tabulation of committed and  
non-committed owners  
Exhibit "C"  
Authority for Expenditure  
Exhibit "D"  
Operating Agreement  
Exhibit "E"  
Ernst & Young Survey  
Exhibit "F"  
Correspondence, notification  
letters, and proof of delivery

OPPOSITION

We are unaware of any parties opposing this application.

PROCEDURAL MATTERS

None

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Robert L. Bayless

Dated: December 14, 2000

**ROBERT L. BAYLESS, PRODUCER**

P. O. BOX 168  
FARMINGTON, NM 87499

FAX NO.  
(505) 326-6911

OFFICE NO.  
(505) 326-2659

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November 21, 2000

Ms. Lori Wrotenbery, Director  
**NEW MEXICO OIL  
CONSERVATION DIVISION**  
2040 s. Pacheco Street  
Santa Fe, NM 87505

RE: Application for Compulsory Pooling  
Robert L. Bayless, Operator  
Hun Nop Pi # 2 Well  
W/2 Sec. 19-T26N-R8W  
San Juan County, NM

Dear Ms. Wrotenbery:

Please consider this letter the formal application of Robert L. Bayless for an Order by the New Mexico Oil Conservation Division force-pooling all of the mineral interests from the base of the Pictured Cliffs formation to the base of the Dakota formation underlying the W/2 of Section 19, Township 26 North, Range 8 West, NMPM, San Juan County, New Mexico, forming a 320.04 acre gas spacing and proration unit for the Basin Dakota pool to be dedicated to the Hun Nop Pi # 2 Well and completed in the Basin Dakota pool. Bayless requests that the order designate Robert L. Bayless as operator of the Well, and that it provide for the recovery by the joining working interest owners of the costs of drilling, completing, equipping and operating the Well, together with a reasonable charge for risk involved in drilling and completing the Well. In addition, Bayless requests that the Order establish a reasonable charge for supervision of the Well during the drilling and production stages.

Please place this application on the December 21<sup>st</sup>, 2000, docket of the New Mexico Oil Conservation Division for hearing.

Enclosed are two additional copies of this letter application. Please advise should you require any additional information.

Yours truly,

Paul Hall, CPL/ESA  
Land Manager

cc: Supervisor, District III Office  
New Mexico Oil Conservation Division  
1000 Rio Brazos Road  
Aztec, NM 87410