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

APPLICATION OF RIDGE RUNNER RESOURCES OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No.	

## **APPLICATION**

Pursuant to NMSA § 70-2-17, Ridge Runner Resources Operating, LLC ("Ridge Runner") applies for an order pooling all uncommitted mineral interests in the Bone Spring formation in a 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 W/2 of Sections 2 and 11, Township 20 South, Range 35 East in Lea County, New Mexico. In support of its application, Ridge Runner states the following.

- 1. Ridge Runner (OGRID No. 373013) is a working interest owner in the horizontal spacing unit and has the right to drill thereon.
- 2. The horizontal spacing unit will be dedicated to Ridge Runner's proposed Zeus 2-11 Fed Com #1H well, which will be drilled from a surface location approximately 100' FNL and 330' FWL in Section 2 to a bottom hole location approximately 100' FSL & 330' FWL in Section 11.
  - 3. The completed interval of the well will be orthodox.
- 4. Ridge Runner has undertaken diligent, good-faith efforts to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well but has been unable to obtain voluntary agreements from all of the mineral interest owners.
- 5. The pooling of uncommitted mineral interests will avoid the drilling of unnecessary well, prevent waste, and protect correlative rights.

6. In order to allow Ridge Runner to obtain its just and fair share of the oil and gas

underlying the subject lands, all uncommitted mineral interests in the horizontal spacing unit

should be pooled.

WHEREFORE, Ridge Runner requests that this application be set for hearing on February

4, 2021 and that, after notice and hearing, the Division enter an order:

Pooling all uncommitted mineral interests in the Bone Spring formation underlying

the W/2 W/2 of Sections 2 and 11, Township 20 South, Range 35 East in Lea County;

В. Designating Ridge Runner as operator of the Zeus 2-11 Fed Com #1H well;

C. Authorizing Ridge Runner to recover its costs of drilling, equipping, and

completing the well and allocating the costs among the well's working interest owners;

Approving the actual operating charges and costs of supervision during drilling and D.

after completion, together with a provision for adjusting the rates pursuant to the COPAS

accounting procedure; and

E. Imposing a 200% penalty for the risk assumed by Ridge Runner in drilling and

completing the well against any mineral interest owner who does not voluntarily participate in the

drilling of the well.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

Dana S. Hardy

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

Counsel for Ridge Runner Resources Operating, LLC

2