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

APPLICATION OF COLGATE OPERATING, LLC
FOR COMPULSORY POOLING IN
EDDY COUNTY, NEW MEXICO

CASE NO. 22085

APPLICATION OF COLGATE OPERATING, LLC
FOR COMPULSORY POOLING IN
EDDY COUNTY, NEW MEXICO

CAS

**CASE NO. 22086** 

#### PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., on behalf of Colgate Operating, LLC, as required by the Oil Conservation Commission.

#### **APPEARANCES OF PARTIES**

APPLICANT ATTORNEY

COLGATE OPERATING, LLC Ernest L. Padilla

Padilla Law Firm, P.A.

PO Box 2523

Santa Fe, NM 87504

(505) 988-7577

padillalawnm@outlook.com

OPPOSITION OR OTHER PARTY ATTORNEY

# **STATEMENT OF CASE**

#### **APPLICANT**

Applicant seeks compulsory pooling for the following listed wells in Section 9, Township 19 South, Range 28 East, Eddy County, New Mexico:

#### **OCD Case 22085**

#### Klondike 9 State Com 123H

This proposed well is a horizontal well with a legal surface location in Units I/P of Section 9, T19S, R28E, and an intended legal bottom hole location in Unit L of Section 9, T19S, R28E, Eddy County, New Mexico. It will have a TVD of approximately 7,000 feet and TMD of approximately 12,080 feet, and will target the 2<sup>nd</sup> Bone Spring.

#### Klondike 9 State Com 124H

This proposed well is a horizontal well with a legal surface location in Units I/P of Section 9, T19S, R28E, and an intended legal bottom hole location in Unit M of Section 9, T19S, R28E, Eddy County, New Mexico. It will have a TVD of approximately 7,000 feet and TMD of approximately 12,080 feet, and will target the 2<sup>nd</sup> Bone Spring.

# Klondike 9 State Com 133H

This proposed well is a horizontal well with a legal surface location in Units I/P of Section 9, T19S, R28E, and an intended legal bottom hole location in Unit L of Section 9, T19S, R28E, Eddy County, New Mexico. It will have a TVD of approximately 8,150 feet and TMD of approximately 13,230 feet, and will target the 3<sup>rd</sup> Bone Spring.

#### Klondike 9 State Com 134H

This proposed well is a horizontal well with a legal surface location in Units I/P of Section 9, T19S, R28E, and an intended legal bottom hole location in Unit M Section 9, T19S, R28E, Eddy County, New Mexico. It will have a TVD of approximately 8,150 feet and TMD of approximately 13,230 feet, and will target the 3<sup>rd</sup> Bone Spring.

#### **OCD Case 22086**

# Madera 9 State Com 121H

This proposed well is a horizontal well with a legal surface location in Units A/H of Section 9, T19S, R28E, and an intended legal bottom hole location in Unit D of Section 9, T19S, R28E, Eddy County, New Mexico. It will have a TVD of approximately 7,000 feet and TMD of approximately 12,080 feet, and will target the 2<sup>nd</sup> Bone Spring.

#### Madera 9 State Com 122H

This proposed well is a horizontal well with a legal surface location in Units A/H of Section 9, T19S, R28E, and an intended legal bottom hole location in Unit D of Section 9, T19S, R28E, Eddy County, New Mexico. It will have a TVD of approximately 7,000 feet and TMD of approximately 12,080 feet, and will target the 2<sup>nd</sup> Bone Spring.

#### Madera 9 State Com 131H

This proposed well is a horizontal well with a legal surface location in Units A/H of Section 9, T19S, R28E, and an intended legal bottom hole location in Unit L1 of Section 9, T19S, R28E, Eddy County, New Mexico. It will have a TVD of approximately 8,150 feet and TMD of approximately 13,230 feet, and will target the 3<sup>rd</sup> Bone Spring.

#### Madera 9 State Com 132H

This proposed well is a horizontal well with a legal surface location in Units A/H of Section 9, T19S, R28E, and an intended legal bottom hole location in Unit E Section 9, T19S, R28E, Eddy County, New Mexico. It will have a TVD of approximately 8,150 feet and TMD of approximately 13,230 feet, and will target the 3<sup>rd</sup> Bone Spring.

#### OPPOSITION OR OTHER PARTY

#### PROPOSED EVIDENCE

# **APPLICANT**

Witness	Est. Time	<b>Exhibits</b>
Mark Hajdik - Landman	Approx. 5 minutes	Approx. 7
Sergio Ojeda – Geologist	Approx. 5 minutes	Approx. 10

# **OPPOSITION**

# PROCEDURAL MATTERS

These cases will be presented by affidavit.

Respectfully submitted,

PADILLA LAW FIRM, P.A.

# /s/ Ernest L. Padilla

Ernest L. Padilla
Attorney for Colgate Operating, LLC
PO Box 2523
Santa Fe, New Mexico 87504
505-988-7577
padillalawnm@outlook.com

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II

811 S. First St., Artesia, NM 88210 Phone: (575) 748-1283 Fax: (575) 748-9720 District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division** 1220 S. St Francis Dr. **Santa Fe, NM 87505** 

QUESTIONS

Action 38689

#### **QUESTIONS**

Operator:	OGRID:
COLGATE OPERATING, LLC	371449
300 North Marienfeld Street	Action Number:
Midland, TX 79701	38689
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witness	Not answered.	
Testimony time (in minutes)	Not answered.	