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

APPLICATION OF SPUR ENERGY PARTNERS, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NO. 22407

PRE-HEARING STATEMENT

Spur Energy Partners, LLC ("Applicant") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEYS

Spur Energy Partners, LLC Dana S. Hardy
Michael Rodriguez

P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com

mrodriguez@hinklelawfirm.com

INTERESTED PARTIES ATTORNEYS

No other parties of record.

STATEMENT OF THE CASE

In this case, Applicant seeks an order pooling all uncommitted mineral interests within the Yeso formation in a 480-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Section 10 and NW/4 of Section 11, Township 17 South, Range 33 East, Lea County, New Mexico ("Unit"). The Unit will be dedicated to following wells: Oakmont 10H and Oakmont 60H, which will be horizontally drilled from a surface location in the SW/4NE/4 (Unit G) of Section 11 to a bottom hole location in the SW/4NW/4 (Unit E) of Section 10; and Oakmont 11H and

Oakmont 20H, which will be horizontally drilled from a surface location in the NW/4NE/4 (Unit B) of Section 11 to a bottom hole location in the NW/4NW/4 (Unit D) of Section 10 (collectively the "Wells"). The completed interval of the Wells will be orthodox. The completed interval of the Oakmont 20H will be within 330' of the line separating the N/2N/2 and S/2N/2 of Section 10 and the N/2NW/4 and S/2NW/4 of Section 11 to allow inclusion of this acreage into a standard 480acre horizontal spacing unit. Also to be considered will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately 7.58 miles East and 0.25 miles South of Maljamar, Lea County, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Blair Brummell	Landman	Affidavit	Approx. 7
C. J. Lipinski	Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Applicant will present the above-referenced case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy Michael Rodriguez

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com

mrodriguez@hinklelawfirm.com

Counsel for Spur Energy Partners, LLC

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 69411

QUESTIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	69411
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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