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

APPLICATION OF BTA OIL PRODUCERS, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 22811 & 22812

# PRE-HEARING STATEMENT

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

# **APPEARANCES**

APPLICANT ATTORNEYS

BTA Oil Producers, LLC

Dana S. Hardy

Jackyn M. McLea

Jaclyn M. McLean P.O. Box 2068

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

INTERESTED PARTIES ATTORNEYS

None.

# **STATEMENT OF THE CASE**

In Case No. 22811, Applicant applies for an order pooling all uncommitted interests in the Pennsylvanian Shale Formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the E/2 W/2 of Section 18 and the E/2 NW/4 of Section 19, Township 17 South, Range 36 East, Lea County, New Mexico. The unit will be dedicated to the Bluebell 22115 19-18 State Com #1H well to be horizontally drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 19 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 18.

In Case No. 22812, Applicant applies for an order pooling all uncommitted interests in the Pennsylvanian Shale Formation underlying a 223.81-acre, more or less, standard horizontal spacing unit comprised of Lots 1, 2, 3 and 4 (W/2 W/2 equivalent) of irregular Section 18 and Lots 1 and 2 (W/2 NW/4 equivalent) of irregular Section 19, Township 17 South, Range 36 East, Lea County, New Mexico. The unit will be dedicated to the Bluebell 22115 19-18 State Com #2H well to be horizontally drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 19 to a bottom hole location in Lot 1 (NW/4 NW/4 equivalent) of irregular Section 18.

Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost, 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 8 miles south of Lovington, New Mexico.

# PROPOSED EVIDENCE

| Witness        | Occupation | <b>Estimated Time</b> | <b>Exhibits</b> |
|----------------|------------|-----------------------|-----------------|
| Rex Barker     | Landman    | Affidavit             | Approx. 5       |
| David Childers | Geologist  | Affidavit             | Approx. 4       |

# PROCEDURAL MATTERS

Applicant will present this matter by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy Jaclyn M. McLean

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

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

jmclean@hinklelawfirm.com

Counsel for BTA Oil Producers, 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 110644

### **QUESTIONS**

| Operator:              | OGRID:                                   |
|------------------------|--|
| BTA OIL PRODUCERS, LLC | 260297                                   |
| 104 S Pecos            | Action Number:                           |
| Midland, TX 79701      | 110644                                   |
|                        | Action Type:                             |
|                        | [HEAR] Prehearing Statement (PREHEARING) |

#### QUESTIONS

| Testimony   |   |  |  |
|---|---|--|--|
| Please assist us by provide the following information about your testimony. |   |  |  |
| Number of witnesses   | 2 |  |  |
| Testimony time (in minutes)   | 9 |  |  |