

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

**APPLICATIONS OF BTA OIL PRODUCERS,  
LLC FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 23481 - 23484**

**CONSOLIDATED PRE-HEARING STATEMENT**

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

**APPLICANT**

BTA Oil Producers, LLC

**ATTORNEYS**

Dana S. Hardy  
Jaclyn McLean  
Yarithza Peña  
Hinkle Shanor LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
(505) 982-4554  
dhardy@hinklelawfirm.com  
jmclean@hinklelawfirm.com  
ypena@hinklelawfirm.com

**INTERESTED PARTIES**

None.

**ATTORNEYS**

**STATEMENT OF THE CASE**

In **Case No. 23481**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 W/2 of Section 28 and the W/2 W/2 of Section 33, Township 16 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 28-33 State Com #9H** well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 28 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 33.

In **Case No. 23482**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 W/2 of Section 28 and the E/2 W/2 of Section 33, Township 16 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 28-33 State Com #10H** well, to be drilled from a surface hole location in the NE/4 NW/4 (Unit C) of Section 28 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 33.

In **Case No. 23483**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 319.42-acre, more or less, standard horizontal spacing unit comprised of the W/2 E/2 of Section 33, Township 16 South, Range 36 East, and Lot 2, SW/4 NE/4, W/2 SE/4 (W/2 E/2 equivalent) of irregular Section 4, Township 17 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 33-4 State Com #11H** well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 33, Township 16 South, to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 4, Township 17 South.

In **Case No. 23484**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 319.37-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Section 33, Township 16 South, Range 36 East, and Lot 1, SE/4 NE/4, E/2 SE/4 (E/2 E/2 equivalent) of irregular Section 4, Township 17 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 33-4 State Com #12H** well, to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 33, Township 16 South, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 4, Township 17 South.

The completed intervals of the wells will be orthodox. 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 Capitan 22301 28-33 State Com wells are located approximately 2 miles southwest of Lovington, New Mexico, and the Capitan 22301 33-4 State Com wells are located approximately 3 miles southwest of Lovington, New Mexico.

### **PROPOSED EVIDENCE**

<b>Witness</b>	<b>Occupation</b>	<b>Estimated Time</b>	<b>Exhibits</b>
Adams Davenport	Landman	Affidavit	Approx. 5
David Childers	Geologist	Affidavit	Approx. 5

### **PROCEDURAL MATTERS**

Applicant will present this matter by affidavit if there is no opposition. Applicant requests that the above-referenced matters be consolidated for hearing.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn McLean

Yarithza Peña

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

ypena@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  
**District IV**  
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 211488

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 211488
	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.