

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

**APPLICATIONS OF SPUR ENERGY  
PARTNERS LLC FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO**

**Case No. 23872**

**NOTICE OF INTERVENTION AND OBJECTION TO PRESENTATION BY  
AFFIDAVIT**

James P. Parrot, Miguel Suazo, and Sophia Graham of Beatty & Wozniak, P.C., hereby submit to the Oil Conservation Division (“Division”) this Notice of Intervention in the above-referenced case on behalf of Riley Permian Operating Company, LLC (“Riley”).

In support of this application, Riley provides the following:

1. Intervenor’s Name:

Riley Permian Operating Company, LLC

2. Address of Intervenor’s Attorneys:

James P. Parrot  
Miguel Suazo  
Sophia Graham  
500 Don Gaspar Ave.  
Santa Fe, NM 87505  
(505) 946-2090  
jparrot@bwenergylaw.com  
msuazo@bwenergylaw.com  
sgraham@bwenergylaw.com

3. The Nature of Intervenor’s Interest in the Application:

In Case No. 23872, Spur Energy Partners LLC (“Spur Energy”) submitted to the Division an application for an order pooling all uncommitted interests in the Yeso formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Section 10, Township 18 South, Range 27 East, Eddy County, New Mexico (the “proposed unit”), in order to

drill the Red Skies 10 Federal Com wells.

Riley owns a valid working interest in nearly half of the proposed unit along with acreage in the SW/4 of Section 11, Township 18 South, Range 27 East, Eddy County, New Mexico. Riley is presently awaiting affidavits for expenditures prior to proposing a 1.50 mile well covering the S/2 of Section 10 and the SW/4 of Section 11.

Riley has standing to intervene in Case No. 23872 and Riley's participation will contribute substantially to the prevention of waste and the protection of correlative rights.

4. The Extent of Intervenor's Opposition to Issuance of the Order:

Riley opposes the issuance of the order Spur Energy seeks, submitting that Riley has the better development plan for prevention of waste and protection of correlative rights. Therefore, Riley objects to Spur Energy's case going forward by affidavit and requests a status conference on November 2, 2023 in lieu of a hearing.

Riley respectfully requests that the Division approve its intervention in Case No. 23872.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: 

Miguel Suazo  
James P. Parrot  
Sophia Graham  
500 Don Gaspar Ave.  
Santa Fe, NM 87505  
(505) 946-2090  
[msuazo@bwenergylaw.com](mailto:msuazo@bwenergylaw.com)  
[jparrot@bwenergylaw.com](mailto:jparrot@bwenergylaw.com)  
[sgraham@bwenergylaw.com](mailto:sgraham@bwenergylaw.com)

*Attorneys for Riley Permian Operating  
Company, LLC*

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 30th day of October 2023, as follows:

New Mexico Oil Conservation Division Hearings  
[ocd.hearings@state.nm.us](mailto:ocd.hearings@state.nm.us)

Dana S. Hardy ([dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com))  
Jaclyn M. McLean ([jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com))  
Hinkle Law Firm  
*Attorneys for Spur Energy Partners LLC*

  
Tracy L. Peterson