

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

**APPLICATION OF TASCOSA ENERGY
PARTNERS, LLC FOR APPROVAL OF
THE KONG DELAWARE STATE
EXPLORATORY UNIT, EDDY COUNTY,
NEW MEXICO.**

CASE NO. 24181

PRE-HEARING STATEMENT

Tascosa Energy Partners, LLC (“Tascosa” or “Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division (“Division”).

APPEARANCES

APPLICANT

Tascosa Energy Partners, LLC

ATTORNEYS

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

INTERESTED PARTY

Mewbourne Oil Company

ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, NM 87504
Phone: (505) 982-2043
jamesbruc@aol.com

STATEMENT OF THE CASE

Tascosa seeks approval of the KONG Delaware State Exploratory Unit, a voluntary unit consisting of the following 473.98 acres of State land situated in Eddy County (“Unit Area”):

TOWNSHIP 21 SOUTH, RANGE 26 EAST, N.M.P.M

Section 19: Lots 1-4 and E/2 NW/4

Section 30: Lots 1-4 and E/2 SW/4

The unitized interval is the Delaware Sands formation, at a stratigraphic equivalent of the interval between 2,270 feet and 4,475 feet as found in the Compensated Neutron Formation Density well log on the Boscowitz #1 well (API No. 30-015-20777), located in Section 30, Township 21 South, Range 26 East, Eddy County, New Mexico.

Tascosa has obtained New Mexico State Land Office approval of the Unit Agreement and has met with the working interest owners in the Unit Area to obtain approval from a sufficient percentage of the interest owners to provide effective control of unit operations. The unitized operation and management of the Unit Area is in the best interest of conservation, the prevention of waste, and the protection of correlative rights.

The Unit Area is located approximately 4 miles northwest of Carlsbad, New Mexico.

PROPOSED EVIDENCE

<u>Witness</u>	<u>Occupation</u>	<u>Estimated Time</u>	<u>Exhibits</u>
John Shoberg	Landman	Affidavit	Approx. 3
Helder Alvarez	Geologist	Affidavit	Approx. 6

PROCEDURAL MATTERS

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

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 Tascosa Energy Partners, LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 29, 2024, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

James Bruce
Post Office Box 1056
Santa Fe, NM 87504
Phone: (505) 982-2043
jamesbruc@aol.com
Counsel for Mewbourne Oil Company

/s/ Dana S. Hardy

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 319162

QUESTIONS

Operator: Tascosa Energy Partners, L.L.C 901 W. Missouri Ave Midland, TX 79701	OGRID: 329748
	Action Number: 319162
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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