

**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. 24219 - 24220**

**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**

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**INTERESTED PARTIES**

MRC Permian Company

**ATTORNEYS**

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**STATEMENT OF THE CASES**

In Case No. 24129, BTA applies for an order pooling all uncommitted interests from the top of the First Bone Spring formation to the base of the Second Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 E/2 of Sections 11

and 14, Township 22 South, Range 34 East, Lea County, New Mexico. The Unit will be dedicated to the **Crazy Goat 8711 14-11 State Com #3H** and **Crazy Goat 8711 14-11 State Com #5H** wells, which will be drilled from surface hole locations in the SW/4 SE/4 (Unit O) of Section 14 to bottom hole locations in the NW/4 NE/4 (Unit B) of Section 11.

In Case No. 24220, BTA applies for an order pooling all uncommitted interests from the top of the First Bone Spring formation to the base of the Second Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Sections 11 and 14, Township 22 South, Range 34 East, Lea County, New Mexico. The Unit will be dedicated to the **Crazy Goat 8711 14-11 State Com #4H** and **Crazy Goat 8711 14-11 State Com #6H** wells, which will be drilled from surface hole locations in the SW/4 SE/4 (Unit O) of Section 14 to bottom hole locations in the NE/4 NE/4 (Unit A) of Section 11.

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 wells are located approximately 27 miles southwest of Hobbs, New Mexico.

#### **PROPOSED EVIDENCE**

<b>Witness</b>	<b>Occupation</b>	<b>Estimated Time</b>	<b>Exhibits</b>
Rex Barker	Landman	Affidavit	Approx. 5
Darin A. Dolezal	Geologist	Affidavit	Approx. 5

#### **PROCEDURAL MATTERS**

Applicant intends to consolidate these cases for hearing and will present the cases by affidavit if there is no opposition to its applications.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

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*Counsel for BTA Oil Producers, LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2024, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
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QUESTIONS  
  
Action 323212

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 323212
	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.