

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

**APPLICATION OF ALPHA ENERGY  
PARTNERS II, LLC, TO POOL ADDITIONAL  
INTERESTS UNDER ORDER NO. R-23006,  
EDDY COUNTY, NEW MEXICO**

**Case No. 25185  
Order No. R-23006**

**PREHEARING STATEMENT**

Alpha Energy Partners II, LLC (“Alpha” or “Applicant”), affiliate successor in interest in the Subject Lands to Alpha Energy Partners, LLC (“Alpha”), through its undersigned attorneys, submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division (“Division”) for the above-referenced case.

**APPEARANCES**

**ATTORNEY**

**APPLICANT**

Alpha Energy Partners II, LLC

Darin C. Savage  
Andrew D. Schill  
William E. Zimsky  
214 McKenzie Street  
Santa Fe, New Mexico 87501  
Telephone: 970.385.4401  
Facsimile: 970.385.4901  
darin@abadieschill.com  
andrew@abadieschill.com  
bill@abadieschill.com

INTERESTED PARTY  
MRC Permian Company

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, New Mexico 87504

(505) 988-4421  
(505) 983-6043 Fax  
[mfeldewert@hollandandhart.com](mailto:mfeldewert@hollandandhart.com)  
[agrankin@hollandandhart.com](mailto:agrankin@hollandandhart.com)  
[pmvance@hollandandhart.com](mailto:pmvance@hollandandhart.com)

### **APPLICANT'S STATEMENT OF CASE**

In Case No. 25185, Alpha seeks an order for the specific purpose of (1) pooling additional uncommitted mineral interests under the terms of Division Order No. R-23006 (the "Order") which pooled uncommitted interest in the Wolfcamp formation underlying a 634.36-acres, more or less, standard horizontal spacing unit comprised of the S/2 of Sections 19 and 20, Township 22 South, Range 27 East, Eddy County, New Mexico ("Subject Lands" under the Order); (2) advising the Division and affected parties that Alpha has entered into a farmout agreement with Paloma Permian AssetCO, LLC ("Paloma") by which Paloma, OGRID No. 332449, has the right to earn a portion of Alpha's working interest in the Subject Lands by drilling, completing, and operating the proposed wells under the supervision of Alpha; and (3) providing notice for and approving wells which have undergone certain name changes and adjustments.

1. The Dude 19/20 Fee 203H Well, with a proposed surface hole location (SHL) in the SW/4 SW/4 (Unit M) of Section 21 to a bottom hole location (BHL) in the NW/4 SW/4 (Unit L) of Section 19, has been renamed and revised as **The Dude 20-19 Fee 702H**, which has an adjusted SHL in the SE/4 NE/4 (Unit H) and same quarter-quarter section, Lot 3 (NW/4 SW/4) (Unit L) for its BHL, the FTP and LTP being the NE/4 SE/4 (Unit I) and Lot 3 (Unit L), respectively; the 702H remains orthodox; this well is re-dedicated to the spacing unit as The Dude 20-19 Fee 702H Well as an initial well.

2. The Dude 19/20 Fee 204H Well, with a proposed SHL in the SW/4 SW/4 (Unit M) of Section 21 to a BHL in Lot 4 (SW/4 SW/4) (Unit M) of Section 19, has been renamed and revised as **The Dude 20-19 Fee 701H Well**, which has an adjusted SHL in the SE/4 NE/4 (Unit H) and maintains the same quarter-quarter section (Lot 4, Unit M of Sec. 19) for its BHL; the 701H remains orthodox; this well is re-dedicated to the spacing unit as The Dude 20-19 Fee 701H Well as an initial well.

3. Alpha and Paloma have also updated their well proposals, the updates sent on October 31, 2024, to working interest owners in the unit, to include the 701H and 702H Wells and to propose one additional well for the lower part of the Wolfcamp formation: **The Dude 20-19 Fee 801H Well** with a SHL located in the SE/4 NE/4 (Unit H) of Section 20 and a BHL located in Lot 3 (NW/4 SW/4) (Unit L) of Section 19; the 801H Well is added and dedicated to the unit as an initial well, along with the 701H and 702H Wells. The completed interval of the 801H Well is orthodox.

### **APPLICANT'S PROPOSED EVIDENCE**

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Riley Morris	Approx. 10 min	Approx. 5
Geologist: Jason McClain	Approx. 10 min	Approx. 5

### **PROCEDURAL MATTERS**

No party has formally objected to this case; therefore, Alpha plans to proceed by affidavit.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ *Darin C. Savage*

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Darin C. Savage

William E. Zimsky  
Andrew D. Schill  
214 McKenzie Street  
Santa Fe, New Mexico 87501  
Telephone: 970.385.4401  
Facsimile: 970.385.4901  
darin@abadieschill.com  
bill@abadieschill.com  
andrew@abadieschill.com

*Attorneys for Alpha Energy Partners II, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed with the New Mexico Oil Conservation Division and was served on counsel of record via electronic mail on March 6, 2025:

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
pmvance@hollandhart.com  
*Attorneys for MRC Permian Company*

/s/ *Darin C. Savage*

Darin C. Savage

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

QUESTIONS

Action 439925

QUESTIONS

Operator: AEP II Operating LLC P.O. Box 10701 Midland, TX 79702	OGRID: 332909
	Action Number: 439925
	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)	20