

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

**APPLICATION OF READ AND STEVENS, INC.
TO AMEND ORDER NO. R-22748-A,
LEA COUNTY, NEW MEXICO.**

**CASE NO. 25039
ORDER NO. R-22748-A**

**APPLICATION OF READ AND STEVENS, INC.
TO AMEND ORDER NO. R-22749-A,
LEA COUNTY, NEW MEXICO.**

**CASE NO. 25040
ORDER NO. R-22749-A**

**APPLICATION OF READ AND STEVENS, INC.
TO AMEND ORDER NO. R-22750-A,
LEA COUNTY, NEW MEXICO.**

**CASE NO. 25041
ORDER NO. R-22750-A**

**APPLICATION OF READ AND STEVENS, INC.
TO AMEND ORDER NO. R-22751-A,
LEA COUNTY, NEW MEXICO.**

**CASE NO. 25042
ORDER NO. R-22751-A**

REVISED READ AND STEVEN'S CONSOLIDATED PRE-HEARING STATEMENT

Read and Stevens, Inc. ("Read and Stevens" or "Applicant"), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Read and Stevens
("Read and Stevens")

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

OTHER

Alpha Energy Partners, LLC
("Alpha")

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

Avant Operating II, LLC
("Avant")

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800

APPLICANT'S STATEMENT OF THE CASE

In **Case No. 25039**, Read and Stevens seeks an order to amend Order No. R-22748-A ("Order") to allow for an extension of time for drilling the proposed initial well under the Order. On June 15, 2023, the Division entered Order R-22748 in Case 23524 pooling the uncommitted interest in the Bone Spring formation (Teas; Bone Spring [58960]) underlying a standard 320.95-acre, more or less, horizontal well spacing unit comprised of Lot 4, SW/4 NW/4 and the W/2 SW/4 of Section 3, and the W/2 W/2 of Section 10, Township 20 South, Range 34 East, NMPM, Lea County, New Mexico (the "Unit"). Permian Resources Operating, LLC ("Permian") is the

designated operator of the Unit and Order R-22748 dedicates the Unit to the proposed initial **Riddler 3-10 Fed Com #111H** (API No. 30-025-53912), **Riddler 3-10 Fed Com #121H** (API No. 30-025-53916) and **Riddler 10 Fed Com #122H** (API No. 30-025-53917). In May of 2024, Read & Stevens filed an application in Case 24518 to extend the drilling deadline, noting that there was good cause to do so. Following a public hearing on the request, the Division issued order R-22748-A extending until June 16, 2025, the period to drill the proposed wells.

In **Case No. 25040**, Read and Stevens seeks an order to amend Order No. R-22749-A (“Order”) to allow for an extension of time for drilling the proposed initial well under the Order. On June 15, 2023, the Division entered Order R-22749 in Case 23525 pooling the uncommitted interest in the Bone Spring formation (Teas; Bone Spring [58960]) underlying a standard 320.85-acre, more or less, horizontal well spacing unit comprised of Lot 3, SE/4 NW/4 and the E/2 SW/4 of Section 3, and the E/2 W/2 of Section 10, Township 20 South, Range 34 East, NMPM, Lea County, New Mexico (the “Unit”). Permian Resources Operating, LLC (“Permian”) is the designated operator of the Unit and Order R-22749 dedicates the Unit to the proposed initial **Riddler 3-10 Fed Com #112H** (API No. 30-025-53913), **Riddler 3-10 Fed Com #123H** (API No. 30-025-53918) and **Riddler 10 Fed Com #124H** (API No. 30-025-53919). In May of 2024, Read & Stevens filed an application in Case 24520 to extend the drilling deadline, noting that there was good cause to do so. Following a public hearing on the request, the Division issued order R-22749-A extending until June 16, 2025, the period to drill the proposed wells.

In **Case No. 25041**, Read and Stevens seeks an order to amend Order No. R-22750-A (“Order”) to allow for an extension of time for drilling the proposed initial well under the Order. On June 15, 2023, the Division entered Order R-22750 in Case 23526 pooling the uncommitted interest in the Bone Spring formation (Teas; Bone Spring [58960]) underlying a standard

320.75-acre, more or less, horizontal well spacing unit comprised of Lot 2, SW/4 NE/4 and the W/2 SE/4 of Section 3, and the W/2 E/2 of Section 10, Township 20 South, Range 34 East, NMPM, Lea County, New Mexico (the “Unit”). Permian Resources Operating, LLC (“Permian”) is the designated operator of the Unit and Order R-22750 dedicates the Unit to the proposed initial **Riddler 3-10 Fed Com #113H** (API No. 30-025-53914), **Riddler 3-10 Fed Com #125H** (API No. 30-025-53920) and **Riddler 10 Fed Com #126H** (API No. 30-025-53921). In May of 2024, Read & Stevens filed an application in Case 24519 to extend the drilling deadline, noting that there was good cause to do so. Following a public hearing on the request, the Division issued order R-22750-A extending until June 16, 2025, the period to drill the proposed wells.

In **Case No. 25042**, Read and Stevens seeks an order to amend Order No. R-22751-A (“Order”) to allow for an extension of time for drilling the proposed initial well under the Order. On June 15, 2023, the Division entered Order R-22751 in Case 23527 pooling the uncommitted interest in the Bone Spring formation (Teas; Bone Spring [58960]) underlying a standard 320.65-acre, more or less, horizontal well spacing unit comprised of Lot 1, SE/4 NE/4 and the E/2 SE/4 of Section 3, and the E/2 E/2 of Section 10, Township 20 South, Range 34 East, NMPM, Lea County, New Mexico (the “Unit”). Permian Resources Operating, LLC (“Permian”) is the designated operator of the Unit and Order R-22751 dedicates the Unit to the proposed initial **Riddler 3-10 Fed Com #114H** (API No. 30-025-53915), **Riddler 3-10 Fed Com #127H** (API No. 30-025-53922) and **Riddler 10 Fed Com #128H** (API No. 30-025-53923). In May of 2024, Read & Stevens filed an application in Case 24521 to extend the drilling deadline, noting that there was good cause to do so. Following a public hearing on the request, the Division issued order R-22751-A extending until June 16, 2025, the period to drill the proposed wells.

Permian is eager to develop this acreage and is seeking to co-develop it with Section 4, 5, 8, and 9 directly adjacent to the west for maximum efficiency and recovery. Permian anticipates a resolution on contested pooling cases on those adjacent lands in the coming months. Good cause therefore exists to extend the deadline to commence drilling under the order. Permian has reached an agreement with Alpha Energy Partners, LLC ("Alpha") regarding timeframe to commence drilling and therefore requests an extension to October 15, 2025.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Mark Hajdik, Landman	Self-Affirmed Statement	Approx. 1

PROCEDURAL MATTERS

Read and Stevens requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

**ATTORNEYS FOR READ AND STEVENS, LLC &
PERMIAN RESOURCES OPERATING, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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

Attorney for Alpha Energy Partners, LLC

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800

Attorney for Avant Operating II, LLC



Paula M. Vance

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 448629

QUESTIONS

Operator: Permian Resources Operating, LLC 300 N. Marienfeld St Ste 1000 Midland, TX 79701	OGRID: 372165
	Action Number: 448629
	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.