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. 25504, 25505

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 ATTORNEYS

BTA Oil Producers, LLC Dana S. Hardy

Jaclyn M. McLean Hardy McLean LLC 125 Lincoln Ave, Ste. 223 Santa Fe, NM 87501 Phone: (505) 230-4410 dhardy@hardymclean.com

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INTERESTED PARTY ATTORNEYS

None.

STATEMENT OF THE CASES

In Case No. 25504, BTA seeks an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 SW/4 of Section 9, the E/2 W/2 of Section 16, and the E/2 NW/4 of Section 21, Township 17 South, Range 36 East, Lea County, New Mexico. The unit will be dedicated to the Vindicator Canyon State Unit Com 418H well, which will be drilled from a surface hole location in the SE/4 NW/4 (Unit F) of Section 21 to a bottom hole location in the NE/4 SW/4 (Unit K) of Section 9.

In Case No. 25505, BTA seeks an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of the E/2 SW/4 and W/2 SE/4 of Section 21, the E/2 W/2 and W/2 E/2 of Section 28, and the E/2 NW/4 and W/2 NE/4 of Section 33, Township 17 South, Range 36 East, Lea County, New Mexico. The unit will be dedicated to the Vindicator Canyon State Unit Com 417H well, which will be drilled from a surface hole location in the SE/4 NW/4 (Unit F) of Section 21 to a bottom hole location in the SE/4 NW/4 (Unit F) of Section 33. The completed interval of the Vindicator Canyon State Unit Com 417H well will be located within 330' of the quarter-quarter section line separating the E/2 W/2 and W/2 E/2 of Sections 21, 28, and 33 to allow for the creation of a 640-acre standard, horizontal spacing unit.

Also to be considered will be the cost of drilling and completing the Vindicator Canyon State Unit wells and the allocation of the costs, the designation of BTA as the operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Willis Price	Landman	Affidavit	Approx. 5
J.T. Truong	Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

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

Respectfully submitted,

HARDY MCLEAN LLC

/s/ Dana S. Hardy

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

QUESTIONS

Action 490753

QUESTIONS

Operator:	OGRID:
BTA OIL PRODUCERS, LLC	260297
104 S Pecos	Action Number:
Midland, TX 79701	490753
	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.	