

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

**APPLICATION OF BURNETT OIL COMPANY
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

CASE NO. 25778

BURNETT OIL COMPANY'S PRE-HEARING STATEMENT

Burnett Oil Company ("Burnett"), (OGRID No. 3080) ("Applicant" or "Burnett"), the Applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Burnett Oil Company

ATTORNEY

Benjamin B. Holliday
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107 Katherine Court
San Antonio, Texas 78209
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RESPONDENT

None

APPLICANT'S STATEMENT OF THE CASE

In Case No. 25778, Burnett seeks an order pooling all uncommitted interests within the Yeso formation ("Formation Interval"), designated as an oil pool (Pool Code No. 3250) – underlying a standard 321.4-acre, more or less, horizontal well spacing unit comprised of the N/2 of Section 19, located in Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Applicant seeks to initially dedicate this horizontal spacing unit to the proposed Aggie Well Nos. 1H, 2H, 3H, 31H, and 32H wells ("Wells"):

- a. **The Aggie Well No. 1H**, API No. 30-015-55570, an oil well to be horizontally drilled from a surface hole location in Unit A of Section 24, Township 18 South, Range 26 East, approximately 1,226 feet FNL, and approximately 800 feet FEL, to a bottom hole location in Unit A of Section 19, Township 18 South, Range 27 East, approximately 350 feet FNL, and approximately 101 feet FEL;
- b. **The Aggie Well No. 2H**, API No. 30-015-55571, an oil well to be horizontally drilled from a surface hole location in Unit A of Section 24, Township 18 South, Range 26 East, approximately 1,226 feet FNL, and approximately 800 feet FEL, to a bottom hole location in Unit H of Section 19, Township 18 South, Range 27 East, approximately 1,321 feet FNL, and approximately 101 feet FEL;
- c. **The Aggie Well No. 3H**, API No. 30-015-55572, an oil well to be horizontally drilled from a surface hole location in the Unit A of Section 24, Township 18 South, Range 26 East, approximately 1,306 feet FNL, and approximately 800 feet FEL, to a bottom hole location in Unit A of Section 19, Township 18 South, Range 27 East, approximately 2,990 feet FNL, and approximately 101 feet FEL;
- d. **The Aggie Well No. 31H**, API No. 30-015-55899, an oil well to be horizontally drilled from a surface hole location in the Unit A of Section 24, Township 18 South, Range 26 East, approximately 1,246 feet FNL, and approximately 800 feet FEL, to a bottom hole location in Unit A of Section 19, Township 18 South, Range 27 East, approximately 660 feet FNL, and approximately 101 feet FEL;
- e. **The Aggie Well No. 32H**, API No. 30-015-55898, an oil well to be horizontally drilled from a surface hole location in the Unit A of Section 24, Township 18 South, Range 26

East, approximately 1,286 feet FNL, and approximately 800 feet FEL, to a bottom hole location in Unit H of Section 19, Township 18 South, Range 27 East, approximately 1,981 feet FNL, and approximately 101 feet FEL.

The completed interval of the Wells will be orthodox and comply with statewide setbacks for oil wells. Burnett has sought and been unable to obtain voluntary agreement for development of these lands from all working interest and/or unleased mineral owners in the subject acreage.

APPLICANTS PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Kristine Pilgrim, Landman	Affidavit	Approximately 5
Trey Cortez, Geologist	Affidavit	Approximately 4

PROCEDURAL MATTERS

Burnett intends to present this case by affidavit if there is no opposition at the time of the hearing.

Respectfully submitted,

HOLLIDAY ENERGY LAW GROUP, PC

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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 530327

QUESTIONS

Operator: BURNETT OIL CO INC 801 Cherry Street Unit #9 Fort Worth, TX 76102	OGRID: 3080
	Action Number: 530327
	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)	5