

Oil Conservation Division
for
RKI Exploration and Production
CUSHHOLM ENERGY OPERATING, LLC

CASE NOS. 16399, 16400

RKI EXPLORATION AND PRODUCTION, LLC'S PRE-HEARING STATEMENT

RKI Exploration and Production (“RKI”) (OGRID No. 246289) submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

RKI Exploration and Production

ATTORNEY

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APPLICANT'S STATEMENT OF CASES

In Case No. 16399, RKI seeks an Order pooling all mineral interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) in the 320-acre, more or less, spacing and proration unit comprised of the S/2 of Section 10, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico. RKI proposes to dedicate the spacing and proration unit as the project area for the **Cass Draw 10-23-27 Fee No. 401H Well**.

In Case No 16400, RKI seeks an Order pooling all mineral interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) in the 320-acre, more or less, spacing and proration unit comprised of the N/2 of Section 10, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico. RKI proposes to dedicate the spacing and proration unit as the project area for the **Johnson 10-23-27 Fee No. 401H Well**.

APPLICANT'S PROPOSED EVIDENCE

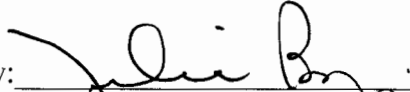
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Aaron Young – Landman	Approx. 15	Approx. 6
Kasmira Workman – Geologist	Approx. 15	Approx. 4

PROCEDURAL MATTERS

RKI requests that Case Nos. 16399 and 16400 be consolidated for the hearing. If unopposed, RKI anticipates presenting these cases by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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**ATTORNEYS FOR
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