

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF ROVER OPERATING, LLC
FOR STATUTORY UNITIZATION, EDDY COUNTY,
NEW MEXICO.**

Case No. 16354

**APPLICATION OF ROVER OPERATING, LLC
FOR APPROVAL OF A SECONDARY RECOVERY
PROJECT, EDDY COUNTY, NEW MEXICO.**

Case No. 16355

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Rover Operating, LLC
Suite 300
17304 Preston Road
Dallas, Texas 75252

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Amanda Barringer

OPPONENT

COG Operating LLC

OPPONENT'S ATTORNEY

Jordan L. Kessler
Ocean Munds-Dry

STATEMENT OF THE CASE

APPLICANT

Case No. 16354: Applicant seeks an order statutorily unitizing all mineral interests in the Unitized Formation (the top of the Loco Hills Sand to the base of the Lovington Sand) in the proposed RP State Unit underlying 639.60 acres of state lands covering all of Section 2 of

Township 17 South, Range 31 East, N.M.P.M. Among the matters to be considered at hearing, pursuant to the New Mexico Statutory Unitization Act, NMSA 1978 §§70-7-1 *et seq.*, will be: The necessity of unit operations; the determination of horizontal and vertical limits of the unit area; the determination of the fair, reasonable, and equitable allocation of production and costs of production, including capital investments, to each of the tracts in the unit area; and such other matters as may be necessary and appropriate.

Case No. 16355: Applicant seeks approval to institute a secondary recovery project in the RP State Unit Area by the injection of water into the Unitized Formation (the top of the Loco Hills Sand to the base of the Lovington Sand) in wells located on 639.60 acres of state lands covering all or parts of Section 2, Township 17 South, Range 31 East, N.M.P.M.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
_____ (landman)	20 min.	Approx. 5
Brady Wilton (engineer)	20 min.	Approx. 5

OPPONENT

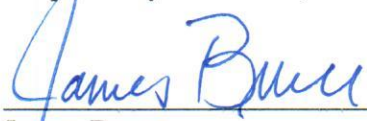
<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
------------------	------------------	-----------------

PROCEDURAL MATTERS

Applicant requests that these matters be consolidated for hearing.

Rover and COG are trying to resolve any differences they have in this matter.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

jamesbruc@aol.com

Attorney for Rover Operating, LLC

Cc: Counsel of record