

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

**AMENDED APPLICATION OF
NOVO OIL & GAS NORTHERN DELAWARE, LLC
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16282

**AMENDED APPLICATION OF
NOVO OIL & GAS NORTHERN DELAWARE, LLC
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16283

NOVO'S AMENDED PRE-HEARING STATEMENT

Novo Oil & Gas Northern Delaware, LLC ("NOVO"), the wholly subsidiary of Novo Oil & Gas, LLC, submits this Amended Pre-Hearing Statement for the above referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

Novo Oil & Gas Northern Delaware, LLC	Candace Callahan Beatty & Wozniak, P.C. 500 Don Gaspar Avenue Santa Fe, NM 87505 Tel (505) 983-8764 <i>ccallahan@bwenergylaw.com</i>
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TDY Industries, LLC	James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 Tel (505) 982- 2043 <i>jamesbruc@aol.com</i>
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BTA Oil Producers	Michael H. Feldewert Jordan L. Kessler Adam G. Rankin Julia Broggi Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504
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STATEMENT OF CASE

In Case No. **16282** Novo seeks an order creating a 320-acre non-standard spacing and proration unit in the Culebra Bluff; Bone Spring, South Pool (15011) limited to all depths below 8,773 feet to the base of the Bone Spring formation, comprised of the S/2S/2 of Section 4 and S/2S/2 of Section 5, Township 23 South, Range 29 East, Eddy County, New Mexico. Applicant further seeks the pooling of all uncommitted interests in the Bone Spring formation underlying this acreage. This non-standard unit is to be dedicated to the applicant's **Rana Salada Fed Com 0504 134H well** which will be horizontally drilled from a surface location in the SE/4SE/4 of Section 6, Township 23 South, Range 29 East, to a first take-point location in the SW/4SW/4 of Section 5, Township 23 South, Range 29 East, to a bottom hole location in the SE/4SE/4 of Section 4, Township 23 South, Range 29 East.

In Case No. **16283** Novo seeks an order creating a 320-acre non-standard spacing and proration unit in the Culebra Bluff; Bone Spring, South Pool (15011) limited to all depths below 8,773 feet to the base of the Bone Spring formation, comprised of the N/2S/2 of Section 4 and N/2S/2 of Section 5, Township 23, Range 29 East, Eddy County, New Mexico Applicant further seeks the pooling of all uncommitted interests in the Bone Spring formation underlying this acreage. This non-standard unit is to be dedicated to the applicant's **Rana Salada Fed Com 0504 133H well** which will be horizontally drilled from a surface location in the NE/4SE/4 of Section 6, Township 23 South, Range 29 East, to a first take-point location in the NW/4SW/4 of Section 5, Township 23 South, Range 29 East, to a bottom hole location in the NE/4SE/4 of Section 4, Township 23 South, Range 29 East.

The completed intervals for all of the proposed wells will be orthodox.

PROPOSED EVIDENCE

Novo Oil & Gas Northern Delaware, LLC

WITNESS	ESTIMATED TIME	EXHIBITS
Brandon Patrick Land	Approx. 30 minutes	6

Michael Hale Geologist	Approx. 10 minutes	3
Engineer TBD	Approx. 10 minutes	1

TDY Industries, LLC

WITNESS	ESTIMATED TIME	EXHIBITS
None anticipated		

BTA OIL PRODUCERS, LLC

WITNESS	ESTIMATED TIME	EXHIBITS
None anticipated		

PROCEDURAL MATTERS

If there is no objection to this matter, Novo intends to present this case by affidavit.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: 

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ATTORNEY FOR NOVO OIL & GAS NORTHERN DELAWARE,
LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on January 17, 2019.

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