

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

**APPLICATION OF LIME ROCK RESOURCES II-A, L.P.  
FOR COMPULSORY POOLING, EDDY COUNTY  
NEW MEXICO.**

**Case No. 20319**

**PREHEARING STATEMENT**

This Pre-hearing Statement is submitted by Ann Landrith Holdings, LLC by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

APPLICANT:

ATTORNEY:

Gary Larson  
Hinkle Shanor LLP  
218 Montezuma Ave.  
Santa Fe, NM 87501  
[glarson@hinklelawfirm.com](mailto:glarson@hinklelawfirm.com)

OPPOSITION OR OTHER PARTY:

Ann Landrith Holdings, LLC

ATTORNEY:

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**STATEMENT OF CASE**

APPLICANT:

OPPOSITION OR OTHER PARTY:

Ann Landrith Holdings, LLC contends that all or a portion of the proposed spacing and proration unit and applicable depths are not subject to a pooling clause under an oil and gas lease held by the applicant. Ann Landrith LCC further contents that the applicant has not negotiated in

good faith to conform the underlying royalty to current horizontal drilling standards and existing market conditions.

**PROPOSED EVIDENCE**

**APPLICANT**

**WITNESSES**  
**OPPOSITION**

EST. TIME

EXHIBITS

Landman expert to be named

**WITNESSES**

**EST. TIME**

**EXHIBITS**

None.

**PROCEDURAL MATTERS**

Although this case was submitted by affidavit, Ann Landrith Holdings LLC should be allowed to present evidence of current royalty rates and requests further continuance to the Division's May 30 docket.

Respectfully submitted:

PADILLA LAW FIRM, P.A.

**/s/ ERNEST L. PADILLA**

ERNEST L. PADILLA

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing pleading was electronically mailed to the following:

Gary Larson  
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[glarson@hinklelawfirm.com](mailto:glarson@hinklelawfirm.com)

on this 9<sup>th</sup> day of May, 2019.

**/s/ ERNEST L. PADILLA**

