

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

**APPLICATION OF IMPETRO OIL & GAS, LLC  
FOR COMPULSORY POOLING  
LEA COUNTY, NEW MEXICO**

**CASE NO. 20790**

**IMPETRO'S PRE-HEARING STATEMENT**

ImPetro Oil & Gas, LLC ("ImPetro") through undersigned counsel, file this Pre-Hearing Statement pursuant to section 19.15.4.13.B NMAC.

**APPEARANCES**

APPLICANT  
ImPetro Oil & Gas, LLC

APPLICANTS' ATTORNEY  
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**STATEMENT OF THE CASE**

ImPetro Oil & Gas, LLC ("ImPetro" or "Applicant") seeks an order pooling all uncommitted interests in the Wolfcamp formation (Jal; Wolfcamp, West Pool 33813), in the 640 acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 18 and 19, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the **Blue Marlin Federal Com #1H** well to be drilled from a surface hole location in the NW/4 NW/4 (Unit C) of Section 18 (120' FNL and 1330' FWL), with a first take point 100' FNL and 1120' FWL, to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 19 (100' FSL and 1120' FWL) and the **Blue**

**Marlin Federal Com #2H** well to be drilled from a surface hole location in the NE/4 NW/4 (Unit D) of Section 18 (120' FNL and 1300' FWL), with a first take point 100' FNL and 330' FWL, to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 19 (100' FSL and 330' FWL). Also to be considered are Applicant's designation as the operator of the spacing unit and the wells, the cost of drilling and completing the wells and allocation of the costs thereof, as well as the actual operating charges and costs of supervision, and imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells.

### **PROPOSED EVIDENCE**

#### **Applicants' Proposed Evidence**

WITNESS	ESTIMATED TIME	EXHIBITS
Tracy Gibbs, Landman	15 minutes	Approx. 6
Nathan Guidorzi, Geologist	15 minutes	Approx. 4

### **PROCEDURAL MATTERS**

As of the date of this Pre-Hearing Statement, no other person has appeared. In the event this case is unopposed, Applicant may request to submit this case for decision based upon affidavit.

RESPECTFULLY SUBMITTED

Gallagher & Kennedy, P.A.

By   
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