

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

**APPLICATION OF SPC RESOURCES, LLC  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 20859**

**SPC'S PRE-HEARING STATEMENT**

SPC Resources, LLC, applicant in the above-referenced cases, submits this consolidated Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

SPC RESOURCES, LLC

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile

**APPLICANT'S STATEMENT OF CASE**

In **Case No. 20859**, SPC seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220)) underlying a standard 635.06-acre, more or less, horizontal well spacing unit comprised of Lots 1-4 and the S/2 N/2 (N/2 equivalent) of irregular Section 5, and Lots 1-5, the SE/4 NW/4, and the S/2 NE/4 (N/2 equivalent) of irregular Section 6, Township 22 South, Range 27 East, NMPM, Eddy County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the proposed initial **Betty 5-6 WCXY #2H well** to be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 5 to a bottom-hole location in the SW/4 NW/4 (Lot 5) of Section 6. The

completed interval for the proposed well will comply with the setback requirements of the Special Rules for the Purple Sage Wolfcamp Pool.

**APPLICANT'S PROPOSED EVIDENCE**

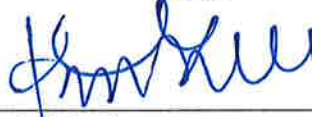
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Nicole Singer, Landman	Affidavit	Approx. 5
John Weihe, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

SPC intends to present this case by affidavits if uncontested at time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



---

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
kaluck@hollandhart.com

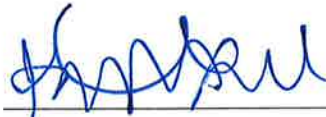
**ATTORNEYS FOR SPC RESOURCES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2019 I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

Ernest L. Padilla  
PADILLA LAW FIRM, P.A.  
P.O. Box 2523  
Santa Fe, NM 87504  
[epadillalaw@qwestoffice.net](mailto:epadillalaw@qwestoffice.net)

***Attorney for BK Exploration Corporation***



---

Kaitlyn A. Luck