

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

**APPLICATION OF NOVO OIL & GAS
NORTHERN DELAWARE, LLC
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NOS. 20888 & 20889

NOVO'S CONSOLIDATED PRE-HEARING STATEMENT

Novo Oil and Gas Northern Delaware, LLC ("Novo") (OGRID No. 372920), applicant in the above-referenced cases, submits this Consolidated Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Novo Oil & Gas Northern
Delaware, LLC

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In **Case No. 20888**, Novo seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation (Culebra Bluff; Bone Spring, South (15011)) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 13, Township 23 South, Range 28 East, and the S/2 of Section 18, Township 23 South, Range 29 East, NMPM, Eddy

County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the following proposed initial wells:

- The **Ovation Fed Com 1318 #133H Well** (API No. pending) and the **Ovation Fed Com 1318 #134H Well** (API No. pending), both of which will be horizontally drilled from a common surface location in the SE/4 of Section 14, T23S, R28E, to bottom hole locations in the SE/4 SE/4 (Unit P) of Section 18.
- The **Ovation Fed Com 1318 #136H Well** (API No. pending) to be horizontally drilled from a surface location in the SE/4 of Section 14, T23S, R28E, to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 18.

The completed interval for the **Ovation Fed Com 1318 #133H Well** will remain within 330 feet of the N/2 S/2 of Sections 13 and 18 to allow inclusion of these proximity tracts in a standard 640-acre horizontal well spacing comprised of the S/2 of Sections 13 and 18.

In **Case No. 20889**, Novo seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220)) underlying a standard 634.72-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 13, Township 23 South, Range 28 East, and the S/2 of Section 18, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the following proposed initial wells:

- The **Ovation Fed Com 1318 #214H Well** (API No. pending), the **Ovation Fed Com 1318 #223H Well** (API No. pending), the **Ovation Fed Com 1318 #224H Well** (API No. pending), the **Ovation Fed Com 1318 #233H Well** (API No. pending), and the **Ovation Fed Com 1318 #234H Well** (API No. pending), each of which will be horizontally drilled from a common surface location in the SE/4

of Section 14, T23S, R28E, to bottom hole locations in the SE/4 SE/4 (Unit P) of Section 18.

- The **Ovation Fed Com 1318 #213H Well** (API No. pending), the **Ovation Fed Com 1318 #216H Well** (API No. pending), the **Ovation Fed Com 1318 #226H Well** (API No. pending), and the **Ovation Fed Com 1318 #236H Well** (API No. pending), each of which will be horizontally drilled from a common surface location in the SE/4 of Section 14, T23S, R28E, to bottom hole locations in the NE/4 SE/4 (Unit I) of Section 18.

The completed intervals of these wells will comply with setbacks as required by the Special Rules for the Purple Sage Wolfcamp Pool.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Patrick, Landman	Affidavit	Approx. 8
Michael Hale, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Novo respectfully requests that these cases be consolidated for hearing. If uncontested, Novo intends to present these cases by affidavits.

Respectfully submitted,

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