

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

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

Case Nos. 20916 and 20917

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Novo Oil & Gas Northern Delaware LLC as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Novo Oil & Gas Northern Delaware LLC

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Brandon Patrick

OPPONENT

BTA Oil Producers, LLC

OPPONENT'S ATTORNEY

Gary Larson

STATEMENT OF THE CASE

APPLICANT

Case No. 20916: Novo Oil & Gas Northern Delaware, LLC applies for an order pooling all mineral interests in the Wolfcamp formation underlying a (proximity tract) horizontal spacing unit comprised of the N/2 of Section 8 and the N/2 of Section 9, Township 23 South, Range 29 East, NMPM. The unit will be dedicated to the Astrodog Fed. Com. 0809 Well Nos. 211H, 212H, 215H, 221H, 222H, 225H, 231H, 232H, and 235H, horizontal wells with first take points in the W/2NW/4 of Section 8 and last take points in the E/2NE/4 of Section 9.

Case No. 20917: Novo Oil & Gas Northern Delaware, LLC applies for an order pooling all mineral interests in the Bone Spring formation (from 8773 feet subsurface as found in the Road Lizard 5 Fed. Com. Well No. 2H [API No. 30-015-39283] to the base of the Bone Spring formation) underlying a (proximity tract) horizontal spacing unit comprised of the N/2 of Section 8 and the N/2 of Section 9, Township 23 South, Range 29 East, NMPM. The unit will be dedicated to the Astrodog Fed. Com. 0809 Well Nos. 111H, 112H, 131H, 132H, and 135H, horizontal wells with first take points in the W/2NW/4 of Section 8 and last take points in the E/2NE/4 of Section 9.

Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

OPPONENTS

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBIT</u>
Brandon Patrick (landman)	20 min.	Approx. 15
Michael Hale (geoscientist)	15 min.	Approx. 12
Zach Everman (reservoir engineer)	15 min.	Approx. 6
Kurt Shipley (operations)	10 min.	Approx. 4

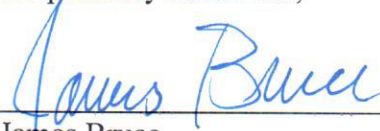
OPPONENTS

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBIT</u>
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PROCEDURAL MATTERS

The cases should be consolidated for hearing.

Respectfully submitted,



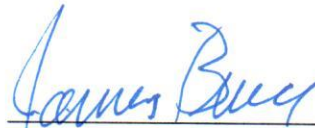
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Attorney for Novo Oil & Gas Northern
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 7th day of November, 2019 by e-mail:

Gary Larson
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James Bruce