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

APPLICATION OF RIDGE RUNNER RESOURCES OPERATING, LLC FOR COMPULSORY POOLING, NON-STANDARD SPACING AND PRORATION UNIT, EDDY COUNTY, NEW MEXICO.

CASE NO. 20922

PREHEARING STATMENT

This Pre-hearing Statement is submitted by Ridge Runner Resources Operating, 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:	Ridge Runner Resources Operating, LLC
ATTORNEY:	Ernest L. Padilla Padilla Law Firm, P.A. PO Box 2523 Santa Fe, New Mexico 87504 (505) 988-7577 padillalaw@qwestoffice.net
OPPOSITION OR OTHER PARTY :	Marathon Oil Permian LLC
ATTORNEY:	Deana M. Bennett Modrall Sperling PO Box 2168 Albuquerque, NM 87103-2168 (505) 848-1834 <u>dmb@modrall.com</u>

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order pooling all mineral interests within the Parkway Bone Spring Pool (Pool Code 49622) as to the proposed oil and gas wells listed below, underlying Sections 32 and 33, Township 19 South, Range 30 East, NMPM, Eddy County, New Mexico. These wells are located approximately 19 miles southeast of Loco Hills, New Mexico.

- The proposed Armstrong 32-33 Fed Com W #1H to be horizontally drilled to a depth sufficient to test the Wolfcamp XY interval of the Wolfcamp Formation from an orthodox SHL 360' FNL & 100' FWL, being in Unit letter D of Section 32 and a BHL 330' FNL & 100' FEL being in Unit letter A of Section 33, T19S, R30E;
- 2) The proposed Armstrong 32-33 Fed Com W #2H to be horizontally drilled to a depth sufficient to test the Wolfcamp XY interval of the Wolfcamp Formation from an orthodox SHL 360' FSL & 100' FWL, being in Unit letter M of Section 32 and a BHL 330' FSL & 100' FEL, being in Unit letter P of Section 33, T19S, R30E;
- 3) The proposed Armstrong 32-33 Fed Com B #1H to be horizontally drilled to a depth sufficient to test the 3rd Bone Spring sand of the Parkway Bone Spring Pool (Pool Code 49622) from an orthodox SHL330' FNL & 100' FWL being in Unit D of Section 32 and the BHL 330' FNL & 100' FEL being in Unit A of Section 33, T19S, R30E;
- 4) The proposed Armstrong 32-33 Fed Com B #2H to be horizontally drilled to a depth sufficient to test the 3rd Bone Spring Sand of the Parkway Bone Spring Pool (Pool Code 49622) from an orthodox SHL 1980' FNL & 100' FWL, being in Unit letter E of Section 32, and the BHL 1980' FNL & 100' FEL, being in unit letter H of Section 33, T19S, R30E;
- 5) The proposed Armstrong 32-33 Fed Com B #3H to be horizontally drilled to a depth sufficient to test the 3rd Bone Spring Sand of the Parkway Bone Spring Pool (Pool Code 49622) from an orthodox SHL 1980' FSL & 100' FWL of Section 32, being in Unit letter L of Section 32, and the BHL 1980' FSL & 100' FEL, being in Unit letter I of Section 33, T19S, R30E;
- 6) The proposed Armstrong 32-33 Fed Com B #4H to be horizontally drilled to a depth sufficient to test the 3rd Bone Spring Sand of the Parkway Bone Spring Pool (Pool Code 49622) from an orthodox SHL 330' FSL & 100' FWL of Section 32, being in Unit letter M of Section 32, and the BHL 330' FSL & 100' FEL, being in Unit letter P of Section 33, T19S, R30E.

OPPOSITION OR OTHER PARTY:

PROPOSED EVIDENCE

APPLICANT

WITNESSES Robert Shelton (Landman) **EST. TIME** 15 Minutes

EXHIBITS Approx. 6

Mike Burke

15 Minutes

Approx. 4

(Geologist)

Kelvin Fisher 15 Minutes Approx. 4 (Engineer)

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted:

PADILLA LAW FIRM, P.A.

/s/ Ernest L. Padilla Ernest L. Padilla PO Box 2523 Santa Fe, New Mexico 87504 505-988-7577 padillalaw@qwestoffice.net

CERTIFICATE OF SERVICE

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

Deana M. Bennett

dmb@modrall.com

on this 5^h day of December, 2019.

<u>/s/ Ernest L. Padilla</u> Ernest L. Padilla