

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

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

**CASE NOS. 20762 & 20859  
ORDER NOS. R-21096 & R-21100**

**SPC RESOURCES, LLC'S MOTION FOR RELIEF FROM  
TIMELINES IN PARAGRAPH 23 IN POOLING ORDER**

SPC Resources, LLC ("SPC Resources"), applicant in the above-referenced cases, moves the Oil Conservation Division ("Division") for relief from the timelines imposed on SPC Resources in paragraph 23 of Order Nos. R-21096 and R-21100, pursuant to the Division's continuing jurisdiction over these matters, as follows:

1. Division Order R-21096 was entered on February 12, 2020, following hearing on September 19, 2019; Division Order R-21100 was entered on February 12, 2020, following hearing on November 14, 2019 (collectively, the "Orders"). Copies of the Orders are attached as *Exhibits A* and *B*, respectively.

2. Pursuant to the Orders, the Division "retains jurisdiction over [these matters] for the entry of such orders as may be deemed necessary."

3. Paragraph 23 of the Orders provides that the:

Operator shall submit to OCD and each owner of a working interest in the pool ("Pooled Working Interest") an itemized schedule of estimated costs to drill, complete, and equip the well ("Estimated Well Costs") no later than: (a) for an initial well, no later than thirty (30) days after the date of this Order; (b) for an infill well proposed by Operator, no later than (30) days after the later of the initial notice period pursuant to 19.15.13.10(B) NMAC or the extension granted by the OCD Director pursuant to 19.15.13.10(D) NMAC; or (c) for an infill well proposed by an owner of a Pooled Working Interest,

no later than thirty (30) days after expiration of the last action required by 19.15.13.11 NMAC.

4. Due to the significant number of unleased mineral interests in these cases, SPC Resources requests relief from the deadlines imposed by that paragraph following the issuance of the pooling orders to allow sufficient time for SPC Resources to complete the mailing process and to proceed with its development and required notices in a manner and timeframe that aligns more closely with SPC's plans.

5. Accordingly, SPC Resources respectfully requests that Division enter an order modifying paragraph 23 to provide:


After the effective date of this order, the operator shall submit to OCD and each owner of an uncommitted working interest in the pool ("Pooled Working Interest") an itemized schedule of estimated costs to drill, complete, and equip the well ("Estimated Well Costs").

6. The proposed modification ensures that the final election notice proposal, which includes an estimate of well costs, is submitted to each Pooled Working Interest after the order is entered, but within a timeframe that more closely aligns with the timeline for activity as planned by the operator.

WHEREFORE, SPC Resources respectfully requests that the Division grant this motion and modify Paragraph 23 of Order Nos. R-21096 and R-21100, as requested herein.

Respectfully submitted,

HOLLAND & HART LLP



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**ATTORNEYS FOR SPC RESOURCES, LLC**

**CERTIFICATE OF SERVICE**

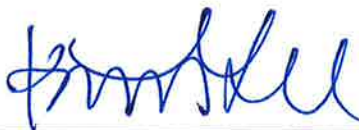
I hereby certify that on March 9, 2020, I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

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