

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

**APPLICATION OF SPUR ENERGY
PARTNERS, LLC FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NOS. 21584 & 21585

SPUR ENERGY PARTNERS, LLC'S CONSOLIDATED PRE-HEARING STATEMENT

Spur Energy Partners, LLC ("Spur") (OGRID No. 328947), the applicant in the above-referenced case, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Spur Energy Partners, 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
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

APPLICANT'S STATEMENT OF CASE

In **Case No. 21584**, Spur seeks an order pooling all uncommitted interests in a portion of the Yeso formation, from the top of the Atoka; Glorieta Yeso Pool (Pool code 3250) to a depth of 3200 feet, underlying a standard 200-acre, more or less, horizontal spacing unit comprised of the N/2 S/2 of Section 28, and the NE/4 SE/4 of Section 29, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico. Spur seeks to dedicate this spacing unit to these proposed

initial wells: (1) the **Radiohead #1H well**, and (2) the **Radiohead #2H well**, to be drilled from a common surface location in the NW/4 SE/4 (Unit J) of Section 29 to bottom hole locations in the NE/4 SE/4 (Unit I) of Section 28. The completed intervals of the wells will comply with Statewide rules for oil wells. A depth severance exists in the Yeso formation within the proposed the horizontal spacing unit, and Spur seeks to pool only a portion of the Atoka; Glorieta Yeso Pool from the top of the pool at a stratigraphic equivalent of 2,279 feet measured depth, as defined in the Gamma Ray-Neutron Log of the Len Mayer 1 Well (API No. 30-015-05926), to a depth of 3200 feet. Spur will provide notice of this hearing to the vertical offset parties within the pool who are not subject to this pooling application.

In **Case No. 21585**, Spur seeks an order pooling all uncommitted interests in a portion of the Yeso formation, in the Atoka; Glorieta Yeso Pool (3250) from a depth of 3,201 feet to the base of the Pool, underlying a standard 200-acre, more or less, horizontal spacing unit comprised of the N/2 S/2 of Section 28, and the NE/4 SE/4 of Section 29, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico. Spur seeks to dedicate this spacing unit to these proposed initial wells: (1) the **Radiohead #3H well**, and (2) the **Radiohead #4H well**, to be drilled from a common surface location in the NW/4 SE/4 (Unit J) of Section 29 to bottom hole locations in the NE/4 SE/4 (Unit I) of Section 28. The completed intervals of the wells will comply with Statewide rules for oil wells. A depth severance exists in the Yeso formation within the proposed the horizontal spacing unit. Accordingly, Spur seeks to pool only a portion of the Atoka; Glorieta Yeso Pool from 3,201 feet to the bottom of the Yeso formation, at a stratigraphic equivalent of 4,460 feet measured depth, as defined in the Gamma Ray-Neutron Log of the Len Mayer 1 Well (API No. 30-015-05926).

APPLICANT'S PROPOSED EVIDENCE

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Name and Expertise		
Megan Peña, Landman	Affidavit	Approx. 4
C.J. Lipinski Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

If uncontested at the time of hearing, Spur intends to present these consolidated cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



By: _____

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 SPUR ENERGY PARTNERS, LLC