

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

**APPLICATION OF SPC RESOURCES, LLC  
TO AMEND ORDER NO. R-21100,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 21576  
ORDER NO. R-21100**

**SPC'S PRE-HEARING STATEMENT**

SPC Resources, LLC, applicant in the above-referenced case, submits this Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

SPC Resources, LLC ("SPC Resources")

**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

**OTHER PARTIES**

City of Carlsbad

Deana M. Bennett  
Modrall, Sperling, Roehl, Harris & Sisk, P.A.  
Post Office Box 2168  
500 Fourth Street, NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800

Elaine Mead Murphy individually and  
as trustee of the Elaine Mead Murphy  
Revocable Trust

J.E. Gallegos  
Michael J. Condon  
Gallegos Law Firm, P.C.  
460 St. Michael's Drive, Bldg. 300  
Santa Fe, New Mexico 87505  
(505) 983-6686

## **APPLICANT'S STATEMENT OF CASE**

In **Case No. 21576**, SPC Resources seeks to amend Order No. R-21100 (“Order”): (1) to pool additional interest owners under the terms of Order No. R-21100, (2) to allow for an extension of time for drilling the well under the Order, (3) update the name and location (if necessary) of the Proposed Well, and (4) to conform Order R-21100 to the amended order template (“Amended Order”) described in the Division Director’s April 9, 2020 *Letter to Counsel Regarding Amended CP Order Template*. Division Order No. R-21100, entered on February 12, 2020 in Case No. 20859, created a 635.06-acre, more or less, standard horizontal spacing unit underlying the Lots 1-4 and the S/2 N/2 (N/2 equivalent) of irregular Section 5, and Lots 1-5, the SE/4 NW/4, and the S/2 NE/4 (N/2 equivalent) of irregular Section 6, Township 22 South, Range 27 East, NMPM, Eddy County, New Mexico (the “Unit”), and designated SPC Resources as the operator of the Unit. Order No. R-21100 further pooled the uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp Pool (Pool Code 98220)) in the Unit and dedicated the Unit to the **Betty 5-6 WCXY #2H well** (API No. 30-015-pending). Since the entry of the Order, SPC Resources desires to change the name of the Proposed Well from the Betty 5-6 WCXY #2H well to the **Betty 402H Well**. The location of the Proposed Well has not changed, with the surface hole location in the SE/4 NE/4 (Unit H) of Section 5, to a bottom hole location in the SW/4 NW/4 (Lot 5) of Section 6, Township 22 South, Range 27 East.

SPC Resources seeks to pool additional interest owners in the Unit under the terms of Order No. R-21100. The pooling of the additional interest owners under the terms of Order No. R-21100 will prevent waste, will protect correlative rights, and will promote administrative efficiency. In order to permit SPC Resources to obtain its just and fair share of the oil and gas

underlying the subject lands, the additional interest owners should be pooled in the Unit pursuant to the terms of Order No. R-21100.

SPC Resources requests that Order No. R-21100 be re-opened and amended to allow SPC Resources additional time to commence drilling the well under the Order. There is good cause for SPC Resources' request for an extension of time due to the unfavorable economic environment, the global pandemic caused by COVID and reduction in rig count, and SPC Resources has delayed its intended plans to develop the acreage subject to the Order. Under the Order, SPC Resources would be required to commence drilling the well by February 12, 2021, and therefore, asks for the deadline to commence drilling the well be extended for a year, to February 12, 2022.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Colleen Bradley, Land Representative	Affidavit	Approx. 5

#### **PROCEDURAL MATTERS**

SPC Resources intends to present this case by affidavit, if uncontested at time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



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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 SPC RESOURCES, LLC**

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 14, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Deana M. Bennett.  
Modrall, Sperling, Roehl, Harris & Sisk, P.A.  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800  
[dmb@modrall.com](mailto:dmb@modrall.com)

***Attorney for City of Carlsbad***

J.E. Gallegos  
Michael J. Condon  
Gallegos Law Firm, P.C.  
460 St. Michael's Drive, Bldg. 300  
Santa Fe, New Mexico 87505  
(505) 983-6686  
[jeg@gallegoslafirm.net](mailto:jeg@gallegoslafirm.net)  
[mjc@gallegoslafirm.net](mailto:mjc@gallegoslafirm.net)

***Attorney for Elaine Mead Murphy individually and  
as trustee of the Elaine Mead Murphy  
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Kaitlyn A. Luck