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

APPLICATION OF RIDGE RUNNER RESOURCES OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 21635

## RIDGE RUNNER RESOURCES OPERATING, LLC'S PRE-HEARING STATEMENT

Ridge Runner Resources Operating, LLC ("Ridge Runner") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

### **APPEARANCES**

<u>APPLICANT'S ATTORNEYS</u>

Ridge Runner Resources Operating, LLC Dana S. Hardy

P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com

INTERESTED PARTY

INTERESTED PARTY'S ATTORNEYS

No other parties have entered an appearance.

#### **STATEMENT OF THE CASE**

Ridge Runner seeks an order pooling all uncommitted mineral interests in the Bone Spring formation in 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 W/2 of Sections 2 and 11, Township 20 South, Range 35 East in Lea County. The horizontal spacing unit will be dedicated to Ridge Runner's proposed Zeus 2-11 Fed Com #1H well, which will be drilled from a surface location approximately 100' FNL and 330' FWL in Section 2 to a bottom hole location approximately 100' FSL & 330' FWL in Section 11. The completed interval of the

well will be orthodox. Also to be considered will be the costs of drilling and completing the well and the allocation of the costs, the designation of Ridge Runner as the operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The granting of Ridge Runner's application will prevent the drilling of unnecessary wells, protect correlative rights, and prevent waste.

## PROPOSED EVIDENCE

WITNESSES	EST. TIME	<u>EXHIBIT</u>
Robert Shelton (Landman)	10 minutes	Approximately 10
Michael Burke (Geologist)	15 minutes	Approximately 5

Ridge Runner reserves its right to call a rebuttal witness(es) if appropriate.

#### **PROCEDURAL MATTERS**

Ridge Runner is not aware of any procedural matters to be resolved prior to the hearing. If there is no opposition to its application, Ridge Runner will present its case by affidavit.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy Dana S. Hardy P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com

Counsel for Ridge Runner Resources Operating, LLC