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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF RSC RESOURCES LIMITED PARTNERSHIP FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 14,932

### PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

### **APPEARANCES**

**APPLICANT** RSC Resources LP 6824 Island Ct. Midland, Texas 79707 Attention:

Randy S. Cate

**OPPONENT** 

APPLICANT'S ATTORNEY James Bruce P.O. Box 1056 Santa Fe. New Mexico 87504 (505) 982-2043

OPPONENT'S ATTORNEY

#### STATEMENT OF THE CASE

#### **APPLICANT**

Applicant seeks an order pooling all mineral interests from the surface to the base of the Wolfcamp formation underlying the following described acreage in Section 14, Township 24 South, Range 28 East, NMPM, and in the following manner: The N/2 to form a standard 320acre gas spacing and proration unit for any and all formations or pools developed on 320-acre spacing within that vertical extent; the NW/4 to form a standard 160-acre gas spacing and proration unit for any and all formations or pools developed on 160-acre spacing within that vertical extent; and the NE/4NW/4 to form a standard 40-acre oil spacing and proration unit for any and all formations or pools developed on 40-acre spacing within that vertical extent. The units are to be dedicated to the Marra Well No. 1, to be re-entered at an orthodox location in the NE/4NW/4 of Section 14. Also to be considered will be the cost of re-entering and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for

supervision, designation of Guardian Operating Corp. as operator of the well, and a 200% charge for the risk involved in re-entering and completing the well.

# **OPPONENT**

# PROPOSED EVIDENCE

## APPLICANT

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBITS</u>

Randall Cate 15 min. Approx. 6

<u>OPPONENT</u>

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBITS</u>

## PROCEDURAL MATTERS

James 1

Respectfully submitted,

James Bruce
Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for RSC Resources Limited Partnership