

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

**APPLICATION OF RKI EXPLORATION  
AND PRODUCTION FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.**

**CASE NO. 15216**

**APPLICANT'S PRE-HEARING STATEMENT**

RKI Exploration & Production, LLC ("RKI"), the applicant in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

RKI Exploration & Production, LLC  
210 Park Avenue, Suite 900  
Oklahoma City, OK 73102

**ATTORNEY**

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**APPLICANT'S STATEMENT OF CASE**

RKI seek an order from the Division pooling all mineral interests in the Wolfcamp formation underlying the W/2 of Section 35, Township 25 South, Range 29 East, NMPM, Eddy County, New Mexico. This standard spacing and proration unit will be dedicated to the proposed **North Brushy Draw Federal Com 35 #4H Well**, which will be horizontally drilled from a surface location in the SE/4SW/4 (Unit N) to a standard bottom hole location in in the NE/4NW/4 (Unit C) of Section 35. The completed interval for this well will commence in

SE/4SW/4 (Unit N) of Section 35 and remain within the 660-foot standard offset required by the Statewide Rules set forth in 19.15.15 NMAC.

**APPLICANT'S PROPOSED EVIDENCE**

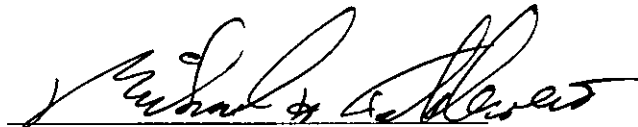
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Sam McCurdy, Landman	Approx. 10	Approx. 5

**PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP



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**ATTORNEYS FOR  
RKI EXPLORATION & PRODUCTION, LLC**