

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

**APPLICATION OF RKI EXPLORATION
AND PRODUCTION FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 15414

RKI'S PRE-HEARING STATEMENT

RKI Exploration and Production, 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 and Production
210 Park Avenue
Suite 700
Oklahoma City, OK 73102

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

RKI Exploration and Production ("RKI") seeks an order (1) creating a 224.75-acre, more or less, non-standard spacing and proration unit comprised of the W/2 W/2 of Section 28 and the NW/4 NW/4 and Lot 4 of Section 33, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico; and (2) pooling all mineral interests in the Wolfcamp formation. Said non-standard unit is to be dedicated to applicant's proposed **RDX Federal Com 28 No. 9H Well**, which will be drilled horizontally from a surface location in the NW/4 NW/4 (Unit D) in

Section 28 to a standard bottom hole location in in the SW/4 NW/4 (Unit E) of Section 33. The completed interval for this well will comply with the Division's setback requirements.

APPLICANT'S PROPOSED EVIDENCE

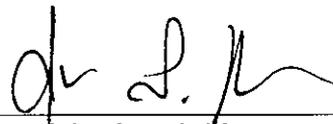
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Sam McCurdy (Landman)	Approx. 10	Approx. 5
Jeanne Allen (Geologist)	Approx. 10	Approx. 5

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP



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**ATTORNEYS FOR
RKI EXPLORATION AND PRODUCTION**