

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

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

APPLICATION OF BC OPERATING, INC., CROWN OIL
PARTNERS V, CRUMP ENERGY PARTNERS, AND
NADEL AND GUSSMAN PERMIAN, LLC FOR A NON-
STANDARD SPACING AND PRORATION UNIT AND
COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 15,594

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Primero Operating, Inc. as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

BC Operating, Inc.
Crown Oil Partners V
Crump Energy Partners
Nadel and Gussman Permian, LLC

APPLICANT'S ATTORNEY

Jordan L. Kessler
Michael Feldewert

OPPONENT

Primero Operating, Inc.
P.O. Box 1433
Roswell, New Mexico 88202

OPPONENT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Phelps White
(575) 626-7660

STATEMENT OF THE CASE

APPLICANT

Applicants seek an order approving a non-standard spacing and proration unit in the Wolfcamp formation comprised of the SE/4 of Section 25 and the E/2 of Section 36, Township 24 South, Range 28 East, N.M.P.M., and pooling a number of interest owners into the well unit.

OPPONENT

Primero Operating, Inc. ("Primero") owns an interest in the proposed well unit. Primero asserts that applicants have not made a good faith effort to obtain the voluntary joinder of the working interest owner in the well unit. Therefore, the application should be denied.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Jim Schultz
(landman)

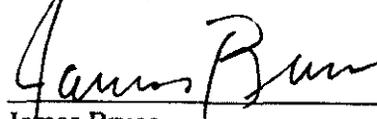
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Approx. 4

PROCEDURAL MATTERS

Opponent has requested a second continuance from applicants.

Respectfully submitted,



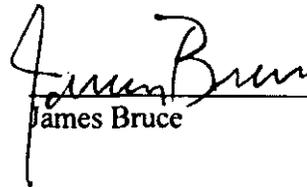
James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com

Attorney for Primero Operating, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 29th day of December, 2016 by e-mail:

Michael Feldewert
Jordan L. Kessler


James Bruce