



MODRALL SPERLING  
LAWYERS

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January 12, 2017

Florene Davidson  
NM Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

**Re: Case No. 15619  
APPLICATION OF CIMAREX ENERGY CO. FOR A NON-  
STANDARD OIL SPACING AND PRORATION UNIT,  
PROJECT AREA AND COMPULSORY POOLING, EDDY  
COUNTY, NEW MEXICO**

Dear Ms. Davidson:

Enclosed please find three copies of the following:

1. Cimarex's Pre-Hearing Statement (No. 15619).

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,



Jennifer L. Bradfute

JLB/zc  
Enclosure

Modrall Sperling  
Roehl Harris & Sisk  
P.A.

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

**APPLICATION OF CIMAREX  
ENERGY CO. FOR A NON-STANDARD  
OIL SPACING AND PRORATION UNIT,  
PROJECT AREA AND COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 15619**

**CIMAREX'S PRE-HEARING STATEMENT**

Cimarex Energy Co. ("Cimarex"), submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Cimarex Energy Co.  
600 N. Marienfeld Street  
STE 600  
Midland, TX 79701

**ATTORNEY**

Earl E. DeBrine, Jr., Esq.  
Jennifer L. Bradfute, Esq.  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
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**OPPONENT:** None anticipated.

**STATEMENT OF CASE**

**APPLICANT:**

Applicant in the above-styled cause seeks an order approving a non-standard project area and oil spacing and proration unit in the Bone Spring formation and pooling of all uncommitted mineral interests in the Bone Spring formation underlying the N/2 N/2 of Sections 26 and 27 and the NE/4 NE/4 of Section 28, Township 19 South, Range 30 East, NMPM, Eddy County, New Mexico.

Cimarex seeks an order from the Division: (1) creating a non-standard 360-acre, more or less, oil spacing and proration unit and non-standard project area in the Bone

Spring formation, comprised of the N/2 N/2 of Sections 26 and 27 and the NE/4 NE/4 of Section 28, Township 19 South, Range 30 East, NMPM, Eddy County, New Mexico; and, (2) pooling all mineral interests in the Bone Spring formation underlying this proposed non-standard project area and spacing and proration unit.

This proposed non-standard spacing and proration unit will be the project area for the **Hackberry 26 Federal Com 1H** well, to be horizontally drilled. Also to be considered will be the cost of drilling and completing said well, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Cimarex as operator of the well, and a 200% charge for risk involved in drilling said well. Said area is located approximately 31 miles southeast of Carlsbad, New Mexico.

**OPPONENT:** None anticipated.

### **PROPOSED EVIDENCE**

#### **APPLICANT:**

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Kelly Reese – Landman	Approx. 15	Approx. 5
Lauren Copley – Geologist	Approx. 10	Approx. 4
Adam Meeks – Engineer	Approx. 10	Approx. 4

### **PROCEDURAL MATTERS**

Cimarex does not have any procedural matters at this time.

Respectfully submitted,

**MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.**

By: \_\_\_\_\_

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