

**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 AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

CASE NO. 15755

PRE-HEARING STATEMENT

Cimarex Energy Co. ("Cimarex"), provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT:

CIMAREX ENERGY CO.

CIMAREX ENERGY CO.'s ATTORNEY

J. Scott Hall, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873
shall@montand.com

OPPONENT/OTHER PARTIES

**MRC PERMIAN COMPANY and
MRC PERMIAN LKE COMPANY,
LLC**

OPPONENT'S ATTORNEY

Jordan L. Kessler
Adam G. Rankin
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, NM 87504-2208
jlkessler@hollandhart.com
agrankin@hollandhart.com

MEWBOURNE OIL COMPANY

James Bruce
Post Office Box 1056
Santa Fe, NM 87504
jamesbruc@aol.com

STATEMENT OF THE CASE

Applicant seeks an order approving a non-standard oil spacing and proration unit comprised of the W/2 of Sections 12 and 13, Township 25 South, Range 28 East NMPM, Eddy County, New Mexico, pooling all mineral interests in the Wolfcamp formation, Purple Sage Wolfcamp Gas Pool (98220), underlying the non-standard unit. The unit will be dedicated to Applicant's Riverbend 12-13 Federal Com Well No. 29H. **Note:** at the direction of the BLM, the surface location of the well has been changed from 330 feet from the south line and 2200 feet from the west line of Section 1, Township 25 South, Range 28 East, NMPM to a new location 1042 feet from the south line and 1500 feet from the west line of Section 1. The bottom hole location remains 330 feet from the South line and 2200 feet from the west line of Section 13, Township 25 South, Range 28 East, NMPM.

PROPOSED EVIDENCE

<u>APPLICANT'S WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Cody Elliott, Landman	15 min.	6
Dave Rittersbacher, Geologist	15 min.	4
Michael Swain, Petroleum Engineer	15 min.	6
Ryan Hempton, Petroleum Engineer	10 min.	3
 <u>OPPONENT'S WITNESSES</u>	 <u>EST. TIME</u>	 <u>EXHIBITS</u>

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: T. Scott Hall

J. Scott Hall

Seth C. McMillan

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

shall@montand.com

smcmillan@montand.com

Attorneys for Cimarex Energy Co.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on July 13, 2017:

Jordan L. Kessler
Adam G. Rankin
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, NM 87504-2208
jlkessler@hollandhart.com
agrarkin@hollandhart.com

James Bruce
Post Office Box 1056
Santa Fe, NM 87504
jamesbruc@aol.com

T. Scott Hall
J. Scott Hall