

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

**APPLICATION OF RKI EXPLORATION AND PRODUCTION,
LLC TO RE-OPEN CASE NO. 15414 TO POOL RECORD TITLE
OWNERS UNDER THE TERMS OF COMPULSORY POOLING
ORDER NO. 14104, EDDY COUNTY, NEW MEXICO.**

CASE NO. 15414 (re-opened)

RKI'S PRE-HEARING STATEMENT

RKI Exploration and Production, LLC, 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, LLC
3500 One Williams Center, MD 35
Tulsa, OK 74172

ATTORNEY

Michael H. Feldewert, Esq.
Jordan L. Kessler, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

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APPLICANT'S STATEMENT OF CASE

RKI Exploration and Production ("RKI") seeks to re-open Case No. 15414 to compulsory pool record title owners pursuant to the terms of Division Order R-14104. Order R-14104 created a 224.74-acre spacing and proration unit consisting of the W/2 W/2 of Section 28 and NW/4 NW/4 and Lot 4 of Irregular Section 33, Township 26 South, Range 30 East, NMPM, in Eddy County, New Mexico and pooled the uncommitted interests in the Wolfcamp Formation (Brushy Draw; Wolfcamp Oil Pool (97136)). The spacing unit was dedicated to the to the RDX Federal Com 28 Well No. 9H (API No. 30-015-43294).

RKI has been unable to obtain the signatures of the record title owners on the federal communitization agreements because the record title owners are either 1) deceased and their estates are not yet probated in New Mexico; or 2) deceased and their estates have not yet filed updated paperwork with the BLM. RKI therefore seeks to compulsory pool remaining uncommitted record title owners in the Unit pursuant to the terms of existing Division Order R-14104.

APPLICANT'S PROPOSED EVIDENCE

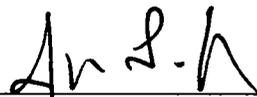
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Aaron Young (Landman)	Approx. 10	Approx. 2

PROCEDURAL MATTERS

This case will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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Jordan L. Kessler
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mfeldewert@hollandhart.com
jlkessler@hollandhart.com

**ATTORNEYS FOR
RKI EXPLORATION AND PRODUCTION**