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

APPLICATION OF ADVANCE ENERGY PARTNERS HAT MESA, LLC FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 16095

APPLICATION OF ADVANCE ENERGY PARTNERS HAT MESA, LLC FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 16096

APPLICATION OF ADVANCE ENERGY PARTNERS HAT MESA, LLC FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 16097

APPLICATION OF ADVANCE ENERGY PARTNERS HAT MESA, LLC FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 16098

PRE-HEARING STATEMENT

Advance Energy Partners Hat Mesa, LLC ("Advance Energy"), provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT:

ADVANCE ENERGY PARTNERS HAT

MESA, LLC's ATTORNEY

ADVANCE ENERGY PARTNERS

HAT MESA

J. Scott Hall, Esq.

MONTGOMERY & ANDREWS, P.A.

P.O. Box 2307

Santa Fe, NM 87504-2307

(505) 982-3873 shall@montand.com

OTHER PARTIES

OTHER PARTIES' ATTORNEY

COG OPERATING LLC

Ocean Munds-Dry William F. Carr 1048 Paseo de Peralta Santa Fe, NM 87501 omundsdry@concho.com

STATEMENT OF THE CASE

In Case No. 16095, Applicant Advance Energy Partners Hat Mesa, LLC seeks an order (1) approving a non-standard 240-acre+ oil spacing and proration unit in the Bone Spring Formation (97895) comprised of the W/2 W/2 of Section 20 and the W/2 SW/4 of Section 17, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico, and (2) pooling all mineral interests underlying the non-standard unit from the top of the 1st Bone Spring Sand to the base of the 2nd Bone Spring Sand.

In Case No. 16096, Applicant Advance Energy Partners Hat Mesa, LLC seeks an order (1) approving a non-standard 240-acre+ oil spacing and proration unit in the Bone Spring Formation (97895) comprised of the E/2 W2 of Section 20 and the E/2 SW/4 of Section 17, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico, and (2) pooling all mineral interests underlying the non-standard unit from the top of the 1st Bone Spring Sand to the base of the 2nd Bone Spring Sand.

In Case No. 16097, Applicant Advance Energy Partners Hat Mesa, LLC seeks an order (1) approving a non-standard 240-acre+ oil spacing and proration unit in the Bone Spring Formation (97895) comprised of the W/2 E2 of Section 20 and the W/2 SE/4 of Section 17, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico, and (2) pooling all mineral interests underlying the non-standard unit from the top of the 1st Bone Spring Sand to the base of the 2nd Bone Spring Sand.

In Case No. 16098, Applicant Advance Energy Partners Hat Mesa, LLC seeks an order (1) approving a non-standard 240-acre+ oil spacing and proration unit in the Bone Spring Formation (97895) comprised of the E/2 E2 of Section 20 and the E/2 SE/4 of Section 17, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico, pooling all mineral interests underlying the non-standard unit from the top of the 1st Bone Spring Sand to the base of the 2nd Bone Spring Sand.

PROPOSED EVIDENCE

APPLICANT'S WITNESSES	EST. TIME	EXHIBITS
ADVANCE ENERGY PARTNERS HAT MESA, LLC		
Paul Burdick, Land	20 min.	12
Ed Caamano, Geology	10 min.	8
OTHER PARTIES' WITNESSES	EST. TIME	EXHIBITS
COG OPERATING LLC		
Unknown.		

PROCEDURAL MATTERS

Applicant requests that Case Nos. 16095, 16096, 16097 and 16098 be consolidated for hearing.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/ J. Scott Hall

J. Scott Hall Post Office Box 2307 Santa Fe, New Mexico 87504-2307 (505) 982-3873 shall@montand.com

Attorneys for Advance Energy Partners Hat Mesa, LLC

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 May 24, 2018:

Ocean Munds-Dry
William F. Carr
1048 Paseo de Peralta
Santa Fe, NM 87501
omundsdry@concho.com
wcarr@concho.com

Attorneys for COG Operating LLC

/s/ J. Scott Hall
J. Scott Hall