

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

**APPLICATION OF RKI EXPLORATION  
AND PRODUCTION, LLC FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.**

**CASE NO. 16401**

**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.  
Adam G. Rankin, Esq.  
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**APPLICANT'S STATEMENT OF CASE**

RKI Exploration and Production ("RKI") seeks an order pooling all mineral interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) in the 319.80-acre, more or less, spacing and proration unit comprised of the N/2 of Section 4, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico. The spacing unit will be dedicated to the **Bindel 4 Fee No. 1H Well**, which will be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) to a standard bottom hole location in in the SW/4 NW/4 (Unit E) of Section 4. The completed interval

for this well will remain within the standard offset required by the Special Rules set forth in Order No. R-14262.

**APPLICANT'S PROPOSED EVIDENCE**

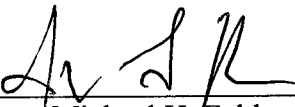
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Aaron Young—Landman	Approx. 10	Approx. 5
Kasmira Workman—Geologist	Approx. 10	Approx. 3

**PROCEDURAL MATTERS**

If uncontested, this case will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

  
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**ATTORNEYS FOR  
RKI EXPLORATION AND PRODUCTION**