

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

**APPLICATION OF PERCUSSION
PETROLEUM OPERATING, LLC FOR
COMPULSORY POOLING AND APPROVAL
OF AN UNORTHODOX WELL LOCATION,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 20188

**PERCUSSION PETROLEUM OPERATING, LLC'S
PRE-HEARING STATEMENT**

Percussion Petroleum Operating, LLC ("Percussion") (OGRID No. 371755), the applicant in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Percussion Petroleum Operating, LLC

ATTORNEY

Michael H. Feldewert, Esq.
Jordan L. Kessler, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
jlkessler@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com

APPLICANT'S STATEMENT OF CASE

Percussion seeks an order 1) pooling all uncommitted interests in the N. Seven Rivers; Glorieta-Yeso Pool (97565) comprised of the E/2 W/2 of Section 34, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico; and 2) approving an unorthodox well location. Said

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horizontal spacing unit is to be dedicated to applicant's proposed **Lakewood Federal No. 9H Well**, which will be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 27 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 34. The completed interval is at an unorthodox location. The first take point is 100 feet from the North line, 2609 feet from the West line and the last take point is 100 feet from the South line, 2609 feet from the West line. Accordingly, the completed interval is closer than 330 feet to the East line and encroaches on the spacing unit to the east.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Stan Mitchell, Landman	Approx. 10	Approx. 5
C.J. Lipinski, Geologist	Approx. 10	Approx. 4

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
 Jordan L. Kessler
 Adam G. Rankin
 Julia Broggi
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**ATTORNEYS FOR PERCUSSION PETROLEUM
 OPERATING, LLC**