

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

**APPLICATION OF NOVO OIL AND GAS NORTHERN
DELAWARE, LLC FOR COMPULSORY POOLING, EDDY
COUNTY, NEW MEXICO.**

CASE NO. 20184

**APPLICATION OF NOVO OIL AND GAS NORTHERN
DELAWARE, LLC FOR COMPULSORY POOLING, EDDY
COUNTY, NEW MEXICO.**

CASE NO. 20185

NOVO's CONSOLIDATED PRE-HEARING STATEMENT

Novo Oil and Gas Northern Delaware, LLC ("Novo") (OGRID No. 372920), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Novo Oil and Gas Northern Delaware, LLC
1001 West Wilshire Blvd, Suite 206
Oklahoma City, OK 73116

ATTORNEY

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

APPLICANT'S STATEMENT OF CASE

In Case No. 20184, Novo seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) in the 320-acre, more or less, horizontal spacing unit comprised of the W/2 of Section 4, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Novo seeks to dedicate the above-referenced horizontal spacing unit to its proposed **Goonch Fed Com 04 No. 211H Well**, which will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) to a standard bottom hole location in in the NW/4 NW/4 (Unit D) of Section 4. The completed interval for this well will remain within the 330-foot setbacks required by the Special Rules for the Purple Sage Wolfcamp Gas Pool set forth in Order No. R-14262.

In Case No. 20185, Novo seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) in the 640-acre, more or less, horizontal spacing unit comprised of the E/2 of Section 4 and the E/2 of Section 9, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Novo seeks to dedicate the above-referenced horizontal spacing unit to its proposed **Goonch Fed Com 0409 No. 214H Well**, which will be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 33, Township 22 South, Range 28 East, to a standard bottom hole location in in the SE/4 SE/4 (Unit P) of Section 9, Township 23 South, Range 28 East. The completed interval for this well will remain within the 330-foot setbacks required by the Special Rules for the Purple Sage Wolfcamp Gas Pool set forth in Order No. R-14262.

APPLICANT'S PROPOSED EVIDENCE

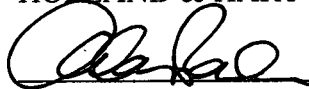
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Patrick, Landman	Approx. 15	Approx. 8

PROCEDURAL MATTERS

Applicant intends to present Case Nos. 20184 and 20185 by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

A handwritten signature in black ink, appearing to be 'M. Feldewert', is written over a horizontal line.

Michael H. Feldewert

Jordan L. Kessler

Adam G. Rankin

Julia Broggi

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

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**ATTORNEYS FOR NOVO OIL AND GAS NORTHERN
DELAWARE, LLC**