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

APPLICATION OF LIME ROCK RESOURCES
II-A, L.P. FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

CASE NO. 20210

APPLICATION OF LIME ROCK RESOURCES
II-A, L.P. FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

CASE NO. 20211

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

Percussion Petroleum Operating, LLC ("Percussion") (OGRID No. 371755) submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Lime Rock Resources II-A, L.P.

ATTORNEY

James Bruce, Esq.
P. O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com

OPPONENT

Percussion Petroleum Operating, LLC

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Kaitlyn A. Luck, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
TEL: (505) 988-4421
FAX: (505) 983-6043
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

OTHER PARTIES

Ann Landrith Holdings, LLC
P.O. Box 3363
Tulsa, OK 74101

Ernest L. Padilla
P.O. Box 2523
Santa Fe, NM 87504-2523
(505) 988-7577
padillalaw@qwestoffice.net

Mewbourne Oil Company

James Bruce
Post Office Box 1056
Santa Fe, NM 87504
(505) 982-2043
jamesbruc@aol.com

STATEMENT OF CASE

Percussion has an interest in Lime Rock’s proposed spacing units and objects to the application for pooling. Percussion has proposed a competing plan of development for the same acreage identified in Lime Rock’s application, as summarized below.

In **Case No. 20232**, Percussion seeks an order pooling all uncommitted interests from the top of the Yeso formation to a depth of 3,000 feet in a proposed 200-acre horizontal spacing unit in the Red Lake Glorieta-Yeso Pool (51120) comprised of the SW/4 NW/4 of Section 18, Township 18 South, Range 27 East, and the S/2 N/2 of Section 13, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico, to be dedicated to the **Toadies 18 No. 1H Well**.

In **Case No. 20371**, an order pooling all uncommitted interests in the Yeso formation from a depth of 3,001 feet to the base of the Yeso formation in a proposed 200-acre horizontal spacing in the Red Lake Glorieta-Yeso Pool (51120) comprised of the SW/4 NW/4 of Section 18, Township 18 South, Range 27 East, and the S/2 N/2 of Section 13, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico, to be dedicated to the proposed **Toadies 18 No. 3H Well** and **Toadies 18 No. 4H Well**.

In **Case No. 20227**, Percussion seeks an order pooling all uncommitted interests from the top of the Yeso formation to a depth of 3,000 feet in a proposed 160-acre horizontal spacing in the Red Lake Glorieta-Yeso Pool (51120) comprised of the N/2 S/2 of Section 13, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico, to be dedicated to the proposed **Cranberries "18" No. 1H Well**.

In **Case No. 20369**, Percussion seeks an order pooling all uncommitted interests in the Yeso formation from a depth of 3,001 feet to the base of the Yeso formation in a proposed 160-acre horizontal spacing unit in the Red Lake Glorieta-Yeso Pool (51120) comprised of the N/2 S/2 of Section 13, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico, to be dedicated to the proposed **Cranberries "18" No. 3H Well** and the **Cranberries "18" No. 4H Well**.

Percussion's Case Nos. 20232 and 20371 compete with Lime Rock's Case No. 20210 over development in the S/2 N/2 of Section 13 and the SW/4 NW/4 of Section 18. Percussion's Case Nos. 20332 and 20369 compete with Lime Rock's Case No. 20211 over development in the N/2 S/2 of Section 13. Percussion's competing pooling applications should be heard at the same time as Lime Rock applications. Percussion's applications should be approved, and Percussion, not Lime Rock, should be designated operator of the wells and spacing units for this acreage.

PERCUSSION'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
K. Samuel Jones, Landman	Approx. 20	Approx. 5
CJ Lipinski, Geologist	Approx. 20	Approx. 4
Brian Zwart, Petroleum Engineer	Approx. 20	Approx. 5

PROCEDURAL MATTERS

Percussion's Case Nos. 20227 and 20369 and 20232 and 20371 are competing compulsory pooling cases with Lime Rock Energy's Case No. 20211 and 20210.

Respectfully submitted,

HOLLAND & HART LLP

By:  _____

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
P.O. Box 2208
Santa Fe, NM 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com

**ATTORNEYS FOR PERCUSSION PETROLEUM
OPERATING, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2019, I filed with the Division clerk the foregoing document served a copy to the following counsel of record via Electronic Mail:

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87508
(505) 982-2043
Email: jamesbruc@aol.com

***Attorney for Lime Rock Resources II-A, L.P. and
Mewbourne Oil Company***

Ernest L. Padilla
P.O. Box 2523
Santa Fe, NM 87504-2523
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