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

APPLICATION OF REGENERATION ENERGY CORP. FOR APPROVAL OF THE BLUE MOON STATE UNIT, EDDY COUNTY, NEW MEXICO.

CASE NO. 20634

REGENERATION'S PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Regeneration Energy Corp. ("Regeneration") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

Regeneration Energy Corp. Michael H. Feldewert

Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart, LLP Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

STATEMENT OF THE CASE

Regeneration seeks an order approving its Blood Moon State Unit. The proposed Unit Area for the Blood Moon Unit consists of the following 640 acres of State land situated in Eddy County ("Unit Area"):

TOWNSHIP 26 SOUTH, RANGE 27 EAST, NMPM

Section 16: All

Regeneration is the designated operator under the Unit Agreement and anticipates reaching agreement with all working interest owners in the Unit Area. The unitized interval is from the

surface down to the stratigraphic equivalent of the base of the Delaware formation at a measured depth of approximately 5,270 feet.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Raye Miller, Landman	Approx. 15 minutes	Approx. 8
Martin Joyce, Geologist	Approx. 10 minutes	Approx. 4

PROCEDURAL MATTERS

Regeneration intends to present its geology testimony and evidence by affidavit, if uncontested at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
arankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

ATTORNEYS FOR REGENERATION ENERGY CORP.

13180696_1