

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

**APPLICATION OF IMPETRO OIL & GAS, LLC  
FOR COMPULSORY POOLING  
LEA COUNTY, NEW MEXICO**

**CASE NO. 20667**

**IMPETRO'S PRE-HEARING STATEMENT**

ImPetro Oil & Gas, LLC ("ImPetro") through undersigned counsel, file this Pre-Hearing Statement pursuant to section 19.15.4.13.B NMAC.

**APPEARANCES**

APPLICANT  
ImPetro Oil & Gas, LLC

APPLICANTS' ATTORNEY  
Dalva L. Moellenberg  
GALLAGHER & KENNEDY, PA  
1239 Paseo de Peralta  
Santa Fe, NM 87501-2758  
Phone: (505) 982-9523  
Fax: (505) 983-8160  
[dln@gknet.com](mailto:dln@gknet.com)

**STATEMENT OF THE CASE**

ImPetro Oil & Gas, LLC ("ImPetro" or "Applicant") seeks an order pooling all uncommitted interests in the Wolfcamp formation, Jal; Wolfcamp, West Pool, in the 640 acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 18 and 19, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells: the **Blue Marlin Federal Com #1H**, the **Blue Marlin Federal Com #2H**, the **Blue Marlin Federal Com #3H**, and the **Blue Marlin Federal Com #4H** wells to be drilled from surface hole locations in the NW/4 NW/4 (Unit C) of Section 18, T25S, R36E to bottom hole locations in the SW/4 SW/4

(Unit M) of Section 19, T25S, R36E. Also to be considered are Applicant's designation as the operator of the spacing unit and the wells, the cost of drilling and completing the wells and allocation of the costs thereof, as well as the actual operating charges and costs of supervision, and imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells.

### **PROPOSED EVIDENCE**

#### **Applicants' Proposed Evidence**

WITNESS	ESTIMATED TIME	EXHIBITS
Neal Rudderow, Landman	15 minutes	Approx. 6
Nathan Guidorzi, Geologist	15 minutes	Approx. 4

### **PROCEDURAL MATTERS**

As of the date of this Pre-Hearing Statement, no other person has appeared. In the event this case is unopposed, Applicant may request to submit this case for decision based upon affidavit.

RESPECTFULLY SUBMITTED

Gallagher & Kennedy, P.A.

By   
Dalva L. Moellenberg  
1239 Paseo de Peralta  
Santa Fe, New Mexico 87501  
[dlm@gknet.com](mailto:dlm@gknet.com)  
(505) 989-7278  
Counsel for ImPetro Oil & Gas, LLC