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

APPLICATION OF RIDGE RUNNER RESOURCES OPERATING, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

Case No. 20717

RIDGE RUNNER RESOURCES OPERATING, LLC'S <u>PRE-HEARING STATEMENT</u>

Ridge Runner Resources Operating, LLC ("Ridge Runner") submits its Pre-Hearing

Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

APPLICANT'S ATTORNEYS

Ridge Runner Resources Operating, LLC

Gary W. Larson Dana S. Hardy P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 glarson@hinklelawfirm.com dhardy@hinklelawfirm.com

OPPONENT

Marathon Oil Permian, LLC

OPPONENT'S ATTORNEY

Deana M. Bennett Modrall Sperling Roehl Harris & Sisk P.A. P.O. Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, NM 87103-2168 Phone: (505) 848-1800 Facsimile: (505) 848-9710 Deana.bennett@modrall.com

INTERVENOR

Fortson Oil Company and Burnett Oil Co., Inc.

INTERVENOR'S ATTORNEYS

James Bruce P.O. Box 1056 Santa Fe, NM 87504 Phone: (505) 982-2043 Fax: (505) 982-2151 jamesbruc@aol.com

Robert C. Grable Kelly Hart & Hallman LLC 201 Main Street, Suite 2500 Fort Worth, TX 76102 Phone: (817) 332-2500 Bob.grable@kellyhart.com

Novo Oil & Gas Northern Delaware, LLC James Bruce P.O. Box 1056 Santa Fe, NM 87504 Phone: (505) 982-2043 Fax: (505) 982-2151 jamesbruc@aol.com

STATEMENT OF THE CASE

Ridge Runner seeks an order pooling all uncommitted mineral interests in the Bone Spring formation in a 1,280-acre standard horizontal spacing unit comprised of Sections 27 and 34, Township 22 South, Range 28 East, in Eddy County. Ridge Runner proposes to dedicate the horizontal spacing unit to: (1) the Warrior Fed Com 2734 B #1H well, which has a surface location in Unit M in Section 22 and a bottom hole location in Unit M in Section 34; (2) the Warrior Fed Com 2734 B #2H well, which has a surface location in Unit P in Section 22 and a bottom hole location in Unit P in Section 34; (3) the Warrior Fed Com 2734 B #3H well, which has a surface location in Unit M in Section 34; (3) the Warrior Fed Com 2734 B #3H well, which has a surface location in Unit M in Section 22 and a bottom hole location in Unit N in Section 34; and (4) the Warrior Fed Com 2734 B #4H well, which has a surface location in Unit P in Section 22 and a bottom hole location in Unit P in Section 22 and a bottom hole location in Unit N in Section 34; and (4) the Warrior Fed Com 2734 B #4H well, which has a surface location in Unit P in Section 22 and a bottom hole location in Unit O in Section 34. The completed intervals for the wells will be orthodox.

PROPOSED EVIDENCE

WITNESSES	EST. TIME	<u>EXHIBIT</u>
Robert Shelton (Landman)	10 minutes	Approximately 6
Michael Burke (Geologist)	15 minutes	Approximately 5
Scott Germann (Geologist)	15 minutes	Approximately 3
Kelvin Fisher (Engineer)	15 minutes	Approximately 5

.

Ridge Runner reserves its right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

Ridge Runner is not aware of any procedural matters to be resolved prior to the hearing.

Respectfully submitted,

HINKLE SHANOR LLP

Gary W. Larson Dana S. Hardy P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 glarson@hinklelawfirm.com dhardy@hinklelawfirm.com

Counsel for Ridge Runner Resources Operating, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of August 2019, I sent a true and correct copy of Ridge Runner Resources, Operating LLC's Pre-Hearing Statement via email to:

Deana M. Bennett Modrall Sperling Roehl Harris & Sisk P.A. P.O. Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, NM 87103-2168 Phone: (505) 848-1800 Facsimile: (505) 848-9710 Deana.bennett@modrall.com

Attorneys for Marathon Oil Permian, LLC

James Bruce P.O. Box 1056 Santa Fe, NM 87504 Phone: (505) 982-2043 Fax: (505) 982-2151 jamesbruc@aol.com

Robert C. Grable Kelly Hart & Hallman LLC 201 Main Street, Suite 2500 Fort Worth, TX 76102 Phone: (817) 332-2500 Bob.grable@kellyhart.com

Attorneys for Fortson Oil Company and Burnett Oil Co., Inc.

James Bruce P.O. Box 1056 Santa Fe, NM 87504 Phone: (505) 982-2043 Fax: (505) 982-2151 jamesbruc@aol.com

Attorney for Novo Oil & Gas Northern Delaware, LLQ

Hady for

4