

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

**APPLICATIONS OF BTA OIL PRODUCERS,
LLC FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

CASE NOS. 23481 - 23484

CONSOLIDATED PRE-HEARING STATEMENT

BTA Oil Producers, LLC (“BTA” or “Applicant”) submits its Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

BTA Oil Producers, LLC

ATTORNEYS

Dana S. Hardy
Jaclyn McLean
Yarithza Peña
Hinkle Shanor LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505) 982-4554
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com
ypena@hinklelawfirm.com

INTERESTED PARTIES

None.

ATTORNEYS

STATEMENT OF THE CASE

In **Case No. 23481**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 W/2 of Section 28 and the W/2 W/2 of Section 33, Township 16 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 28-33 State Com #9H** well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 28 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 33.

In **Case No. 23482**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 W/2 of Section 28 and the E/2 W/2 of Section 33, Township 16 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 28-33 State Com #10H** well, to be drilled from a surface hole location in the NE/4 NW/4 (Unit C) of Section 28 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 33.

In **Case No. 23483**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 319.42-acre, more or less, standard horizontal spacing unit comprised of the W/2 E/2 of Section 33, Township 16 South, Range 36 East, and Lot 2, SW/4 NE/4, W/2 SE/4 (W/2 E/2 equivalent) of irregular Section 4, Township 17 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 33-4 State Com #11H** well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 33, Township 16 South, to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 4, Township 17 South.

In **Case No. 23484**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 319.37-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Section 33, Township 16 South, Range 36 East, and Lot 1, SE/4 NE/4, E/2 SE/4 (E/2 E/2 equivalent) of irregular Section 4, Township 17 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 33-4 State Com #12H** well, to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 33, Township 16 South, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 4, Township 17 South.

The completed intervals of the wells will be orthodox. Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as the operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

The Capitan 22301 28-33 State Com wells are located approximately 2 miles southwest of Lovington, New Mexico, and the Capitan 22301 33-4 State Com wells are located approximately 3 miles southwest of Lovington, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Adams Davenport	Landman	Affidavit	Approx. 5
David Childers	Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Applicant will present this matter by affidavit if there is no opposition. Applicant requests that the above-referenced matters be consolidated for hearing.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy
 Dana S. Hardy
 Jaclyn McLean
 Yarithza Peña
 P.O. Box 2068
 Santa Fe, NM 87504-2068
 Phone: (505) 982-4554
 Facsimile: (505) 982-8623
 dhardy@hinklelawfirm.com
 jmclean@hinklelawfirm.com
 ypena@hinklelawfirm.com
 Counsel for BTA Oil Producers, LLC

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 211488

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 211488
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>