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

APPLICATION OF BTA OIL PRODUCERS, LLC TO EXTEND TIME TO COMMENCE DRILLING OPERATIONS, LEA COUNTY, NEW MEXICO.

Case No. 24948 Order No. R-23119

PRE-HEARING STATEMENT

BTA Oil Producers, LLC ("BTA" or "Applicant") submits its Pre-Hearing Statement

pursuant to the rules of the Oil Conservation Division ("Division").

APPLICANT

ATTORNEYS

BTA Oil Producers, LLC

Dana S. Hardy Jaclyn M. McLean Dylan M. Villescas Hinkle Shanor LLP P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

INTERESTED PARTY

ATTORNEY

None at this time.

STATEMENT OF THE CASE

BTA requests a one-year extension of time, until March 27, 2026, to commence drilling two (2) of the wells authorized by Order No. R-23119. The Division issued Order No. R-23119 in Case No. 24128 on March 27, 2024. The order approved a 640-acre, more or less, standard horizontal spacing unit comprised of the S/2 of Sections 3 and 4, Township 23 South, Range 34 East, Lea County, New Mexico ("Unit"); pooled all uncommitted interests within the Ojo Chiso; Bone Spring, South Pool (Code 97293) underlying the Unit; dedicated the Unit to the Bobwhite 22304 4-3 Fed Com #1H, Bobwhite 22304 4-3 Fed Com #2H, Bobwhite 2234 4-3 Fed Com #3H, Bobwhite 22304 4-3 Fed Com #4H, and Bobwhite 22304 4-3 Fed Com #5H wells (collectively "Wells"); and designated Applicant as operator of the Unit and Wells.

BTA plans to spud the Bobwhite 22304 4-3 Fed Com #1H, Bobwhite 22304 4-3 Fed Com #2H, and Bobwhite 22304 4-3 Fed Com #3H wells by the March 27, 2025, deadline. However, BTA will not be able to spud the Bobwhite 22304 4-3 Fed Com #4H and Bobwhite 22304 4-3 #5H wells by the deadline set out in the Order due to a limitation on sour gas takeaway in the area. BTA expects the gas takeaway constraint to be relieved by mid-2025. Therefore, good cause exists for the requested extension of time to drill the Bobwhite 22304 4-3 Fed Com #4H and Bobwhite 22304 4-3 #5H wells.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Rex Barker	Landman	Affidavit	Approx. 2

PROCEDURAL MATTERS

Applicant intends to present this case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy Dana S. Hardy Jaclyn M. McLean Dylan M. Villescas P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com dvillescas@hinklelawfirm.com *Counsel for BTA Oil Producers, LLC* Sante Fe Main Office Phone: (505) 476-3441

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

QUESTIONS

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Action 406718

QUESTIONS			
Operator:	OGRID:		
BTA OIL PRODUCERS, LLC	260297		
104 S Pecos	Action Number:		
Midland, TX 79701	406718		
	Action Type:		
	[HEAR] Prehearing Statement (PREHEARING)		

QUESTIONS

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