

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

**APPLICATION OF ALPHA ENERGY
PARTNERS II, LLC, FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO**

Case No. 25196

PREHEARING STATEMENT

Alpha Energy Partners II, LLC (“Alpha” or “Applicant”), affiliate successor in interest in the Subject Lands to Alpha Energy Partners, LLC (“Alpha”) through its undersigned attorneys, submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division (“Division”) for the above-referenced case.

APPEARANCES

ATTORNEY

APPLICANT

Alpha Energy Partners, LLC

Darin C. Savage
Andrew D. Schill
William E. Zimsky
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

INTERESTED PARTY
MRC Permian Company

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Fax
mfeldewert@hollandandhart.com

agrarkin@hollandhart.com
pmvance@hollandandhart.com

APPLICANT'S STATEMENT OF CASE

In Case No. 25196, Alpha seeks an order pooling all uncommitted mineral interests in the Bone Spring formation, designated as an oil pool, underlying a standard 317.19-acre, more or less, horizontal spacing unit comprised of Lot 4, SE/4 SW/4, and S/2 SE/4 (a/k/a S/2 S/2) of Section 19 and the S/2 S/2 of Section 20 in Township 22 South, Range 27 East, Eddy County, New Mexico.

1. Alpha is a working interest owner in the proposed horizontal spacing unit ("HSU") and has a right to drill a well thereon.

2. Alpha seeks to have the Division designate Paloma Permian AssetCo, LLC (OGRID No. 332449) as the operator of the horizontal wells proposed herein and HSU.

3. Alpha proposes and dedicates to the HSU two (2) initial wells: **The Dude Fee 20-19 501H** and **The Dude Fee 20-19 551H** to be drilled to a sufficient depth to test the Bone Spring formation.

4. Alpha proposes **The Dude Fee 20-19 501H** to be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 20 to a bottom hole location of Lot 4 (SW/4 SW/4) of Section 19.

5. Alpha proposes **The Dude Fee 20-19 551H** to be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 20 to a bottom hole location of Lot 4 (SW/4 SW/4) of Section 19.

6. Paloma Permian AssetCo, LLC (OGRID No. 332449) is the designated operator for Alpha.

7. All the wells proposed herein are orthodox in their location, and the take points and completed intervals comply with setback requirements under the special rules under statewide rules.

APPLICANT'S PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Riley Morris	Approx. 10 min	Approx. 5
Geologist: Jason McClain	Approx. 10 min	Approx. 5

PROCEDURAL MATTERS

No party has formally objected to this case; therefore, Alpha plans to proceed by affidavit.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ *Darin C. Savage*

Darin C. Savage

William E. Zimsky
Andrew D. Schill
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
bill@abadieschill.com
andrew@abadieschill.com

Attorneys for Alpha Energy Partners II, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed with the New Mexico

Oil Conservation Division and was served on counsel of record via electronic mail on March 6,
2025:

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com
Attorneys for MRC Permian Company

/s/ Darin C. Savage

Darin C. Savage

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 439932

QUESTIONS

Operator: AEP II Operating LLC P.O. Box 10701 Midland, TX 79702	OGRID: 332909
	Action Number: 439932
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	2
Testimony time (in minutes)	20