

**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. 25197**

**PREHEARING STATEMENT**

Alpha Energy Partners II, LLC (“Alpha” or “Applicant”), affiliate successor in interest in the Subject Lands to Alpha Energy Partners, LLC (“Alpha”), OGRID No. 330859, 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](mailto:mfeldewert@hollandandhart.com)  
[agrarkin@hollandandhart.com](mailto:agrarkin@hollandandhart.com)

pmvance@hollandandhart.com

### **APPLICANT'S STATEMENT OF CASE**

In Case No. 25197, Alpha seeks an order pooling all uncommitted mineral interests in the Bone Spring formation, designated as an oil pool, underlying a standard 317.17-acre, more or less, horizontal spacing unit comprised of Lot 3, NE/4 SW/4, and N/2 SE/4 (a/k/a N/2 S/2) of Section 19 and the N/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 proposed horizontal wells and HSU.

3. Alpha proposes and dedicates to the HSU two (2) initial wells: **The Dude Fee 20-19 502H** and **The Dude Fee 20-19 552H** to be drilled to a sufficient depth to test the Bone Spring formation.

4. Alpha proposes **The Dude Fee 20-19 502H** 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 3 (NW/4 SW/4) of Section 19.

5. Alpha proposes **The Dude Fee 20-19 552H** 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 3 (NW/4 SW/4) of Section 19.

6. All the wells proposed herein are orthodox in their location, and the take points and completed intervals comply with setback under the Division's 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/ William E. Zimsky

---

William E. Zimsky

Darin C. Savage  
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 439934

QUESTIONS

Operator: AEP II Operating LLC P.O. Box 10701 Midland, TX 79702	OGRID: 332909
	Action Number: 439934
	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