

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

**APPLICATION OF SPUR ENERGY PARTNERS LLC
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 25271

PRE-HEARING STATEMENT

Spur Energy Partners LLC (“Spur” or “Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

Spur Energy Partners LLC

ATTORNEYS

Dana S. Hardy
Jaclyn M. McLean
Daniel B. Goldberg
Hardy McLean LLC
125 Lincoln Ave, Ste. 223
Santa Fe, NM 87501
Phone: (505) 230-4410
dhardy@hardymclean.com
jmclean@hardymclean.com
dgoldberg@hardymclean.com

INTERESTED PARTY

None.

ATTORNEYS

STATEMENT OF THE CASE

In Case No. 25271, Applicant seeks an order pooling all uncommitted interests in the Yeso formation underlying a 480-acre, more or less, standard horizontal spacing unit comprised of the S/2 of Section 16 and the SW/4 of Section 15, Township 17 South, Range 28 East, Eddy County, New Mexico (“Unit”). Applicant seeks to dedicate the Unit to the following wells (“Wells”):

- **Ghost 16-15 State Com 20H** and **Ghost 16-15 State Com 70H**, which will be drilled from surface hole locations in the NE/4 SE/4 (Unit I) of Section 17 to bottom hole locations in the NE/4 SW/4 (Unit K) of Section 15;

- **Ghost 16-15 State Com 21H** and **Ghost 16-15 State Com 71H**, which will be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 16 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 15; and
- **Ghost 16-15 State Com 10H**, which will be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 16 to a bottom hole location in the SE/4 SW/4 (Unit K) of Section 15.

The completed intervals of the Wells will be orthodox. The completed interval of the **Ghost 16-15 State Com 10H** well will be located within 330' of the quarter-quarter section line separating the N/2 S/2 and the S/2 S/2 of Sections 15 and 16 to allow for the creation of a 480-acre, standard horizontal spacing unit.

Also to be considered will be the cost of drilling and completing the Wells, the allocation of the costs, the designation of Applicant as operator of the Unit and the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

PROPOSED EVIDENCE

<u>Witness</u>	<u>Occupation</u>	<u>Estimated Time</u>	<u>Exhibits</u>
Scott Hartman	Landman	Affidavit	Approx. 5
Matthew Van Wie	Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

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

Respectfully submitted,

HARDY McLEAN LLC

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. McLean

Daniel B. Goldberg

125 Lincoln Ave, Ste. 223

Santa Fe, NM 87501

Phone: (505) 230-4410

dhardy@hardymclean.com

jmclean@hardymclean.com

dgoldberg@hardymclean.com

Counsel for Spur Energy Partners LLC

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 457553

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 457553
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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