

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

**APPLICATION OF 3R OPERATING, LLC
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NOS. 25323, 25324

CONSOLIDATED PRE-HEARING STATEMENT

3R Operating, LLC (“3R” or “Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

3R Operating, 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

Case No. 25323

None.

Case No. 25324

Flat Creek Resources, LLC

ATTORNEYS

Sharon T. Shaheen
Spencer Fane, LLP
P.O. Box 2307
Santa Fe, NM 87504-2307
Phone: (505) 986-2678
sshhaheen@spencerfane.com

STATEMENT OF THE CASE

In Case No. 25323, Applicant applies for an order pooling all uncommitted interests in the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of N/2 of Sections 34 and 35, Township 24 South, Range 26 East, Eddy County, New Mexico. The Unit will be dedicated to the **McMuffin 34 35 Fed Com 701H** well, which will be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 33 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 35.

In Case No. 25324, Applicant applies for an order pooling all uncommitted interests in the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of S/2 of Sections 34 and 35, Township 24 South, Range 26 East, Eddy County, New Mexico. The Unit will be dedicated to the **McMuffin 34 35 Fed Com 703H** well, which will be drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 33 to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 35.

The completed intervals of the wells will be orthodox.

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 units and the wells, and a 200% charge for the risk involved in drilling and completing the wells.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Brian Van Staveren	Landman	Affidavit	Approx. 5
Brian Atwell	Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Applicant intends to consolidate these cases for presentation at hearing, and will present the cases by affidavit if there is no opposition to its applications.

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 3R Operating, 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 457587

QUESTIONS

Operator: 3R Operating, LLC 20405 State Highway 249 Houston, TX 77070	OGRID: 331569
	Action Number: 457587
	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>