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

APPLICATION OF 3R OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NO. 25707

PRE-HEARING STATEMENT

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

APPLICANT ATTORNEYS

3R Operating, LLC Dana S. Hardy

Jaclyn M. McLean Yarithza Peña

Hardy McLean LLC

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INTERESTED PARTIES ATTORNEYS

None.

STATEMENT OF THE CASE

Applicant applies for an order pooling all uncommitted interests in the Woodford formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 W/2 of Sections 28 and 21, Township 26 South, Range 37 East, Lea County, New Mexico ("Unit"). The Unit will be dedicated to the **Pioneer 21 28 Fed Com 951H** well ("Well"), which will be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 21 to a bottom hole location in the SW/4 SW/4 (Unit P) of Section 28.

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

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits	
Kyle Mendez	Landman	Affidavit	Approx. 7	
Brian Atwell	Geologist	Affidavit	Approx. 5	

PROCEDURAL MATTERS

Applicant intends to present this matter by affidavit if there are no objections to its application.

Respectfully submitted,

HARDY MCLEAN LLC

/s/ Dana S. Hardy

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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

Action 529920

QUESTIONS

Operator:	OGRID:
3R Operating, LLC	331569
20405 State Highway 249	Action Number:
Houston, TX 77070	529920
	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.		