

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

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

CASE NO. 21930

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Spur Energy Partners, LLC

ATTORNEYS

Dana S. Hardy
Michael Rodriguez
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com

INTERESTED PARTIES

ConocoPhillips Company

ATTORNEYS

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

STATEMENT OF THE CASE

In **Case No. 21930**, Applicant seeks an order pooling all uncommitted mineral interests in the Yeso formation in a 320-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Section 16, Township 17 South, Range 32 East, Lea County, New Mexico (“Unit”). The horizontal spacing unit will be dedicated to following wells:

- **JG State Com 20H** and **JG State Com 60H**, which will be horizontally drilled from a surface location in the NE/4NE/4 (Unit A) of Section 16 to bottom hole locations in the NW/4NW/4 (Unit D) of Section 16; and
- **JG State Com 21H**, which will be horizontally drilled from a surface location in the SE/4NE/4 (Unit H) of Section 16 to a bottom hole location in the SW/4NW/4 (Unit E) of Section 16 (collectively the “Wells”).

The completed intervals of the Wells are orthodox. The completed interval of the JG State Com 60H will be within 330’ of the line separating the N/2N/2 and S/2N/2 of Section 16 to allow inclusion of this acreage into a standard 320-acre horizontal spacing unit.

Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost, the designation of Spur Energy Partners, LLC as the operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells are located approximately one (1) mile south of Maljamar, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Morgan Landry	Landman	Affidavit	Approx. 7
C. J. Lipinski	Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Applicant intends to present the above-referenced case by affidavit.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy
Michael Rodriguez
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com
Counsel for Spur Energy Partners, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, New Mexico 87504
Attorneys for ConocoPhillips Company

/s/ Dana S. Hardy
Dana S. Hardy

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 31406

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 31406
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witness	2
Testimony time (in minutes)	0