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

APPLICATION OF SPUR ENERGY PARTNERS, LLC TO AMEND ORDER NOS. R-20642, R-20642-B, R-20642-C, & R-20642-D, EDDY COUNTY, NEW MEXICO.

CASE NO. 22049

APPLICATION OF SPUR ENERGY PARTNERS, LLC TO AMEND ORDER NOS. R-20643, R-20643-B, & R-20643-C, EDDY COUNTY, NEW MEXICO.

CASE NO. 22050

SPUR ENERGY PARTNERS, LLC'S CONSOLIDATED PRE-HEARING STATEMENT

Spur Energy Partners, LLC ("Spur") (OGRID No. 328947), the applicant in the above-

referenced cases, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil

Conservation Division.

APPEARANCES

APPLICANT

Spur Energy Partners, LLC

ATTORNEY

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com

APPLICANT'S STATEMENT OF CASE

In Case No. 22049, Spur seeks to pool additional interest owners under the terms of Order Nos. R-20642 and R-20642-B. Division Order No. R-20642, entered June 24, 2019, in Case No. 20191, created a 200-acre, more or less, standard horizontal oil spacing unit in the Penasco Draw; San Andres Yeso Pool (50270) underlying the S/2 S/2 of Section 28, and the SE/4 SE/4 of Section 29, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico (the "Unit"). The Order limited the pooled vertical depths from a stratigraphic equivalent of the top of the San Andres-Yeso formation at 2279 feet measured depth to a depth of 3,200 feet, as defined in the Gamma Ray-Neutron Log from the Len Mayer 1 Well (API No. 30-015-05926). The Order dedicated the spacing unit, subject to the pooled vertical limits, to the proposed initial Nirvana #1H well to be drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 27, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 29. Division Order No. R-20642-B, entered on July 22, 2020, in Case No. 21254, added the Nirvana #2H well, to be drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 27, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 29, to the approved spacing unit pooled under the terms of Order No. R-20642.

Division Order No. R-20642-C, entered on January 19, 2021, in Case No. 21581, pooled additional interest owners under the terms of Order Nos. R-20642 and R-20642-B. Division Order No. R-20642-D, entered on June 24, 2021, in Case No. 21938, extended the drilling deadline under the Orders to June 30, 2022. Since the entry of Order Nos. R-20642, R-20642-B, R-20642-C, and R-20642-D, Spur has determined that there are additional interest owners in the Unit who were not provided notice of the hearing in the prior cases, and as a result, whose interests were not pooled by the terms of Order Nos. R-20642-B, R-20642-D.

In **Case No. 22050**, Spur seeks to pool additional interest owners under the terms of Order No. R-20643. Division Order No. R-20643, entered June 24, 2019, in Case No. 20263, created a 200-acre, more or less, standard horizontal oil spacing unit in the Penasco Draw; San Andres Yeso Pool (50270) underlying the S/2 S/2 of Section 28, and the SE/4 SE/4 of Section 29, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico (the "Unit"). The Order limited the pooled vertical depths from a stratigraphic equivalent of a depth of 3,201 feet to the base of the Yeso formation at a stratigraphic equivalent of 4,460 feet measured depth, as defined in the Gamma Ray-Neutron Log from the Len Mayer 1 Well (API No. 30-015-05926). The Order dedicated the spacing unit, subject to the pooled vertical limits, to the proposed initial Nirvana #3H well to be drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 27, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 29.

Division Order No. R-20643-B, entered on January 19, 2021, in Case No. 21582, pooled additional interest owners under the terms of Order No. R-20643. Division Order No. R-20643-C, entered on June 24, 2021, in Case No. 21939, extended the drilling deadline under the Orders to June 30, 2022. Since the entry of Order No. R-20643, R-20643-B, and R-20643-C, Spur has determined that there are additional interest owners in the Unit who were not provided notice of the hearing in Case No. 20263, and as a result, whose interests were not pooled by the terms of Order No. R-20643.

APPLICANT'S PROPOSED EVIDENCE

<u>WITNESS</u> Name and Expertise

ESTIMATED TIME

EXHIBITS

Rett Dalton, Landman

Approx. 4

Affidavit

PROCEDURAL MATTERS

If uncontested at the time of hearing, Spur intends to present these consolidated cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By:

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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

Operator: Spur Energy Partners LLC	OGRID: 328947	
9655 Katy Freeway	Action Number:	
Houston, TX 77024	38673	
	Action Type: [HEAR] Prehearing Statement (PREHEARING)	
QUESTIONS		
Testimony		

Please assist us by provide the following information about your testimony.		
Number of witness	1	
Testimony time (in minutes)	4	

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