

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

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

CASE NO. 22171

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Alpha Energy Partners, LLC

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STATEMENT OF THE CASE

Applicant applies for an order pooling all uncommitted mineral interests in the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Sections 19 and 20, Township 22 South, Range 27 East, Eddy County, New Mexico (“Unit”). The Unit will be dedicated to The Dude 19/20 Fee 201H and The Dude 19/20 Fee 202H wells (“Wells”). The Dude 19/20 201H well will be horizontally drilled from a surface location in the NE/4NE/4 (Unit A) of Section 20 to a bottom hole location in the NW/4NW/4 (Unit D) of Section 19. The Dude 19/20 202H well will be horizontally drilled from a surface location in the NE/4NE/4 (Unit A) of Section 20 to a bottom hole location in the SW/4NW/4 (Unit E) of Section 19. The completed intervals of the Wells will be orthodox.

Also to be considered will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant 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 1.6 miles southwest of Carlsbad, New Mexico.

PROPOSED EVIDENCE

<u>Witness</u>	<u>Occupation</u>	<u>Estimated Time</u>	<u>Exhibits</u>
Travis Macha	Landman	Affidavit	Approx. 7
Tyler Adams	Reservoir Engineer	Affidavit	Approx. 5

PROCEDURAL MATTERS

Applicant requests Case Nos. 22171 and 22172 be consolidated for hearing and intends to present these matters by affidavit if unopposed at the time of hearing.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
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QUESTIONS

Action 53359

QUESTIONS

Operator: Alpha Energy Partners LLC PO Box 10701 Midland, TX 79702	OGRID: 330859
	Action Number: 53359
	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>