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

## APPLICATION OF SPUR ENERGY PARTNERS, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

CASE NO. 22475

## 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

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#### **INTERESTED PARTIES**

#### ATTORNEYS

No other parties of record.

### **STATEMENT OF THE CASE**

Applicant seeks to pool uncommitted interests from a depth of approximately 4,000' MD to the base of the Yeso formation in a 160-acre, more or less, standard horizontal spacing unit comprised of the S/2S/2 of Section 27, Township 17 South, Range 28 East in Eddy County, New Mexico ("Unit"). The Unit will be dedicated to the Halberd 27 State Com 72H and Halberd 27 State Com 90H wells ("Wells") to be horizontally drilled from a surface location in Unit M of Section 26 to a bottom hole location in Unit M of Section 27. The completed intervals of the Wells

will be orthodox. A depth severance exists in the Yeso formation. Accordingly, Spur seeks to pool uncommitted interests from a depth of approximately 4,000' MD to the base of the Yeso formation (at a stratigraphic equivalent of approximately 5,682' MD as observed on the Geronimo '27' State Com #1 Platform Express, Azimuthal Laterolog (API No. 30-015-31173)). 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 are located approximately 10 miles west of Loco Hills, New Mexico.

#### **PROPOSED EVIDENCE**

Witness	Occupation	<b>Estimated</b> Time	Exhibits
Blair Brummell	Landman	Affidavit	Approx. 7
C. J. Lipinski	Geologist	Affidavit	Approx. 5

#### **PROCEDURAL MATTERS**

Applicant will present the above-referenced case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

<u>/s/ Dana S. Hardy</u> 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* 

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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

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Action 76122

QUESTIONS

Operator:	OGRID:
V-F PETROLEUM INC	24010
P.O. Box 1889	Action Number:
Midland, TX 79702	76122
	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.		