

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

**APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE
LLC TO AMEND ORDER NO. R-21092-A TO EXCLUDE THE
SECOND BONE SPRING INTERVAL, EDDY COUNTY, NEW
MEXICO.**

CASE NO. 22505

NOVO'S CONSOLIDATED PRE-HEARING STATEMENT

Novo Oil and Gas Northern Delaware, LLC ("Novo") (OGRID No. 372920), applicant in the above-referenced cases, submits this Consolidated Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Novo Oil & Gas Northern
Delaware, LLC

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

Novo seeks an order to amend compulsory pooling Order No. R-21092-A to exclude the Second Bone Spring interval from the standard 635.40-acre, more or less, horizontal well spacing unit created thereunder, comprised of the N/2 of Section 13, Township 23 South, Range 28 East, and irregular Section 18, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico. Division Order No. No. R-21092, entered on February 12, 2020, in Case No. 20886, created a

standard 320-acre horizontal well spacing unit comprised of the N/2 of Section 13, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico.

Since Order No. R-21092-B was entered, Applicant has determined that there is an existing horizontal well completed and producing in the Second Bone Spring interval within the proposed spacing unit in the Culebra Bluff; Bone Spring, South Pool [Pool Code 15011] that is operated by OXY USA Inc, the Bank 18 Fed Com #1H well (API No. 30-015-41447). OXY’s well is dedicated to a 160-acre, more or less, horizontal well spacing unit comprised of the N/2 N/2 of irregular Section 18. The OXY well is completed in the Second Bone Spring interval.

Accordingly, Applicant now seeks to exclude the Second Bone Spring interval from Order R-21092-A and its 635.4-acre, more or less, horizontal spacing unit so that it may separately drill and develop the other intervals of the Bone Spring formation. Specifically, Novo requests that the Second Bone Spring interval at a stratigraphic equivalent of 7,575 feet measured depth to 8,442 feet measured depth, as defined in the neutron density log, dated June 7, 1977, recorded in the HF 13 Com #001C well (API 30-015-21138), be excluded from the pooling order. The remainder of the Bone Spring formation in the Culebra Bluff; Bone Spring Pool (15011) will remain dedicated to the spacing unit.

Applicant requests that all other terms and provisions under Order No. R-21092-A and Order R-21092-B remain unchanged and in full force and effect.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Patrick, Landman	Affidavit	Approx. 8
Michael Hale, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

If unopposed at the time of hearing, Novo intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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State of New Mexico
Energy, Minerals and Natural Resources
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QUESTIONS

Action 76203

QUESTIONS

Operator: NOVO OIL & GAS NORTHERN DELAWARE, LLC 1001 West Wilshire Blvd Oklahoma City, OK 73116	OGRID: 372920
	Action Number: 76203
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.