### 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. 22533

## 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**

#### ATTORNEYS

No other parties of record.

### **STATEMENT OF THE CASE**

Applicant seeks to pool all uncommitted mineral interests from the top of the Yeso formation to a depth of approximately 4,000' MD in a 160-acre, more or less, standard horizontal spacing unit comprised of the N/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 21H well ("Well") to be horizontally drilled from a surface location in the SW/4SW/4 (Unit M) of Section 26 to a bottom hole location in the NW4/SW/4 (Unit L) of Section 27. The completed interval of

the Well will be orthodox. A depth severance exists in the Yeso formation. Accordingly, Spur seeks to pool uncommitted interests from the top of the Yeso formation (at a stratigraphic equivalent of approximately 3,694' MD as observed on the Geronimo '27' State Com #1 Platform Express, Azimuthal Laterolog (API No. 30-015-31173)) to approximately 4,000' MD. Also to be considered will be the cost of drilling and completing the Well and the allocation of the cost, the designation of Spur Energy Partners, LLC as the operator of the Well, and a 200% charge for the risk involved in drilling and completing the Well. The Well is 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 76128

QUESTIONS

| Operator:         | OGRID:                                   |
|-------------------|--|
| V-F PETROLEUM INC | 24010                                    |
| P.O. Box 1889     | Action Number:                           |
| Midland, TX 79702 | 76128                                    |
|                   | 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. |  |