

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

**APPLICATIONS OF FASKEN OIL & RANCH, LTD,  
FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.**

**CASE NOS. 22697-22698**

**FASKEN'S CONSOLIDATED PRE-HEARING STATEMENT**

Fasken Oil & Ranch, Ltd ("Fasken"), the applicant in the above-referenced matters, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Fasken Oil & Ranch, Ltd

**ATTORNEY**

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

**OTHER PARTIES**

Marathon Oil Permian LLC

**ATTORNEY**

Deana M. Bennett  
Bryce Smith  
Modrall, Sperling, Roehl, Harris & Sisk,  
P.A.  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800  
deana.bennett@modrall.com  
Bryce.smith@modrall.com

**APPLICANT’S STATEMENT OF THE CASE**

In these consolidated cases, Fasken seeks orders pooling all uncommitted interests in the Bone Spring formation underlying standard 320-acre spacing units in the W/2 of Sections 22 and 15, Township 20 South, Range 32 East, NMPM, Lea County, as follows:

- Under **Case 22697**, Fasken seeks to pool the Bone Spring formation underlying the W/2 W/2 of Sections 22 and 15 for the proposed **Baetz 22/15 Fed Com 1H** well to be drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 22 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 15.
- Under **Case 22698**, Fasken seeks to pool the Bone Spring formation underlying the E/2 W/2 of Sections 22 and 15 for the proposed **Baetz 22/15 Fed Com 2H** well to be drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 22 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 15.

Fasken has sought but been unable to obtain voluntary agreement for the development of these lands from all mineral interest owners in the subject acreage.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Michael Wallace, Landman	Affidavit	Approx. 5
Adam Anderson, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

Fasken requests that these matters be consolidated for hearing and intends to present these cases by affidavit if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Post Office Box 2208  
Santa Fe, NM 87504  
505-998-4421  
505-983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com

**ATTORNEYS FOR FASKEN OIL & RANCH, LTD**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Deana M. Bennett  
Bryce Smith  
Modrall, Sperling, Roehl, Harris & Sisk, P.A.  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800  
*deana.bennett@modrall.com*  
*Bryce.smith@modrall.com*

***Attorneys for Marathon Oil Permian LLC***



---

Michael H. Feldewert

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 94995

**QUESTIONS**

Operator: FASKEN OIL & RANCH LTD 6101 Holiday Hill Rd Midland, TX 79707	OGRID: 151416
	Action Number: 94995
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>