

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

**APPLICATION OF REDWOOD OPERATING
LLC FOR COMPULSORY POOLING, EDDY
COUNTY, NEW MEXICO.**

CASE NO. 22855

REDWOOD'S PRE-HEARING STATEMENT

Redwood Operating LLC ("Redwood" or "Applicant"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Redwood Operating LLC
("Redwood")

ATTORNEY

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OTHER PARTY

Sabinal Energy Operating, LLC

ATTORNEY

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APPLICANT’S STATEMENT OF THE CASE

In this case, Redwood seeks an order pooling all uncommitted interests in the Yeso formation (Red Lake; Glorieta-Yeso [Pool code 51120]) underlying a standard 160-acre, more or less, horizontal spacing unit comprised of the N/2 N/2 of Section 11, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico. Redwood proposes to dedicate the above-referenced spacing unit to the proposed **Brainard 11 #2H** and the **Brainard 11 #3H wells**, to be drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 12, Township 18 South, Range 26 East, to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 11, Township 18 South, Range 26 East. The completed interval for each of the wells will comply with statewide setbacks for oil wells. Redwood has sought and been unable to obtain voluntary agreement for the development of these lands from all mineral owners in the subject acreage.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Derik Smith, Landman	Affidavit	Approx. 5
Charles Sadler, Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Redwood intends to present this case by affidavit at hearing if unopposed.

Respectfully submitted,

HOLLAND & HART LLP

By:  _____

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ATTORNEYS FOR REDWOOD OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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State of New Mexico
Energy, Minerals and Natural Resources
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QUESTIONS

Action 122125

QUESTIONS

Operator: Redwood Operating LLC PO Box 1370 Artesia, NM 88210	OGRID: 330211
	Action Number: 122125
	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.