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. 23012

PRE-HEARING STATEMENT

Spur Energy Partners LLC ("Spur" or "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 Jaclyn M. McLean P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

INTERESTED PARTIES

ATTORNEYS

None.

STATEMENT OF THE CASE

Spur seeks an order pooling all uncommitted interests in the Yeso formation underlying a

320-acre, more or less, standard horizontal spacing unit comprised of the S/2 of Section 25,

Township 19 South, Range 25 East, Eddy County, New Mexico.

• Darko 25 Federal 20H well, which will be horizontally drilled from a surface hole

location in the NE/4 SE/4 (Unit I) of Section 26, Township 19 South, Range 25

East, to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 25, Township 19 South, Range 25 East;

- Darko 25 Federal 21H well, which will be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 26, Township 19 South, Range 25 East, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 25, Township 19 South, Range 25 East; and
- Darko 25 Federal 30H well, which will be horizontally drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 26, Township 19 South, Range 25 East, to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 25, Township 19 South, Range 25 East.

The completed intervals of the wells will be orthodox. The completed interval of the Darko 25 Federal 30H well will be located within 330'of the quarter-quarter section line separating the N/2 S/2 and S/2 S/2 of Section 25 to allow for the creation of a 320-acre standard horizontal spacing unit.

Also to be considered will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately 14.92 miles south and approximately 3.07 miles west of Artesia, New Mexico.

PROPOSED EVIDENCE

| Witness | Occupation | Estimated Time | Exhibits |
|--------------|------------|-----------------------|-----------|
| Drew Oldis | Landman | Affidavit | Approx. 5 |
| Matt Van Wie | Geologist | Affidavit | Approx. 7 |

PROCEDURAL MATTERS

Applicant will present this matter by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

<u>/s/ Dana S. Hardy</u> Dana S. Hardy Jaclyn McLean P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com jmclean@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 138038

QUESTIONS

| Operator: | OGRID: |
|--------------------------|--|
| Spur Energy Partners LLC | 328947 |
| 9655 Katy Freeway | Action Number: |
| Houston, TX 77024 | 138038 |
| | 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. |