### 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. 23046

# **PRE-HEARING STATEMENT**

Spur Energy Partners, LLC ("Spur" or "Applicant") submits its Pre-Hearing Statement

pursuant to the rules of the Oil Conservation Division.

#### APPLICANT

#### **ATTORNEYS**

Spur Energy Partners, LLC

Dana S. Hardy Jaclyn McLean Yarithza Peña Hinkle Shanor LLP P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

#### **INTERESTED PARTY**

Apache Corporation

# ATTORNEYS

Earl E. DeBrine, Jr. Deana M. Bennett Jamie L. Allen Bryce H. Smith MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A. Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 edebrine@modrall.com dbennett@modrall.com jallen@modrall.com

# STATEMENT OF THE CASE

Applicant applies for an order pooling all uncommitted interests within the Yeso formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the S/2 N/2 and N/2 S/2 of Section 21, Township 19 South, Range 25 East, Eddy County, New Mexico. The spacing unit will be dedicated to the following wells:

- Alto Amm 21 #10H well, which will be horizontally drilled from a surface hole location in the SW/4 NW/4 (Unit E) of Section 22, Township 19 South, Range 25 East, to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 21, Township 19 South, Range 25 East;
- Alto Amm 21 #11H well, which will be horizontally drilled from a surface hole location in the NW/4 SW/4 (Unit L) of Section 22, Township 19 South, Range 25 East, to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 21, Township 19 South, Range 25 East;
- Alto Amm 21 #20H well, which will be horizontally drilled from a surface hole location in the SW/4 NW/4 (Unit E) of Section 22, Township 19 South, Range 25 East, to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 21, Township 19 South, Range 25 East;
- Alto Amm 21 #50H well, which will be horizontally drilled from a surface hole location in the NW/4 SW/4 (Unit L) of Section 22, Township 19 South, Range 25 East, to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 21, Township 19 South, Range 25 East;

- Alto Amm 21 #60H well, which will be horizontally drilled from a surface hole location in the SW/4 NW/4 (Unit E) of Section 22, Township 19 South, Range 25 East, to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 21, Township 19 South, Range 25 East; and
- Alto Amm 21 #70H well, which will be horizontally drilled from a surface hole location in the NW/4 SW/4 (Unit L) of Section 22, Township 19 South, Range 25 East, to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 21, Township 19 South, Range 25 East.

The completed intervals of the wells will be orthodox. The completed interval of the Alto Amm 21 #20H well will be located within 330'of the quarter-quarter section line separating the S/2 N/2 and N/2 S/2 of Section 22 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 4.95 miles West and 13.58 miles South of Artesia, New Mexico.

# PROPOSED EVIDENCE

Witness Rett Dalton Matthew Van Wie Occupation Landman Geologist **Estimated Time** Affidavit Affidavit **Exhibits** Approx. 5 Approx. 7

# PROCEDURAL MATTERS

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

Respectfully submitted,

# HINKLE SHANOR, LLP

/s/ Dana S. Hardy Dana S. Hardy Jaclyn McLean Yarithza Peña 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

Released to Imaging: 9/30/2022 8:04:50 AM

# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was sent to the following counsel of record by electronic mail on September 29, 2022:

Earl E. DeBrine, Jr. Deana M. Bennett Jamie L. Allen Bryce H. Smith MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A. Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 edebrine@modrall.com dbennett@modrall.com jallen@modrall.com bsmith@modrall.com

/s/ Dana S. Hardy

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

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Action 147228

QUESTIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
	Action Number:
Houston, TX 77024	147228
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

ŀ	Testimony		
ļ	Please assist us by provide the following information about your testimony.		
	Number of witnesses	Not answered.	
	Testimony time (in minutes)	Not answered.	