

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

**APPLICATIONS OF TASCOSA ENERGY
PARTNERS, LLC FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NOS. 23047 - 23048

CONSOLIDATED PRE-HEARING STATEMENT

Tascosa Energy Partners, LLC (“Tascosa” or “Applicant”) submits its Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

Tascosa Energy Partners, LLC

ATTORNEYS

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INTERESTED PARTIES

None.

ATTORNEYS

STATEMENT OF THE CASE

In **Case No. 23047**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 639.65-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Section 19, Township 20 South, Range 27 East and the N/2 of Section 24, Township 20 South, Range 26 East, Eddy County, New Mexico. The Unit will be dedicated to the following wells:

- **Le Mans 2419 State Com #301H**, which will be horizontally drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 24, Township 20 South, Range

26 East, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 19, Township 20 South, Range 27 East;

- **Le Mans 2419 State Com #302H**, which will be horizontally drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 24, Township 20 South, Range 26 East, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 19, Township 20 South, Range 27 East; and
- **Le Mans 2419 State Com #303H**, which will be horizontally drilled from a surface hole location in the SW/4 NW/4 (Unit E) of Section 24, Township 20 South, Range 26 East, to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 19, Township 20 South, Range 27 East.

The completed intervals of the Wells will be orthodox. The completed interval of the Le Mans 2419 State Com #302H well will be located within 330' of the quarter-quarter section line separating the N/2 N/2 and S/2 N/2 of Section 19, Township 20 South, Range 27 East and Section 24, Township 20 South, Range 26 East, to allow for the creation of a 639.65-acre standard horizontal spacing unit.

In **Case No. 23048**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 640.15-acre, more or less, standard horizontal spacing unit comprised of the S/2 of Section 19, Township 20 South, Range 27 East and the S/2 of Section 24, Township 20 South, Range 26 East, Eddy County, New Mexico. The Unit will be dedicated to the following wells:

- **Le Mans 2419 State Com #304H**, which will be horizontally drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 24, Township 20 South, Range

26 East, to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 19, Township 20 South, Range 27 East;

- **Le Mans 2419 State Com #305H**, which will be horizontally drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 24, Township 20 South, Range 26 East, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 19, Township 20 South, Range 27 East; and
- **Le Mans 2419 State Com #306H**, which will be horizontally drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 24, Township 20 South, Range 26 East, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 19, Township 20 South, Range 27 East.

The completed intervals of the Wells will be orthodox. The completed interval of the Le Mans 2419 State Com #305H well will be located within 330’ of the quarter-quarter section line separating the S/2 S/2 and N/2 S/2 of Section 19, Township 20 South, Range 27 East and Section 24, Township 20 South, Range 26 East, to allow for the creation of a 640.15-acre standard horizontal spacing unit.

Also to be considered in each case 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 10 miles Northwest of Carlsbad, New Mexico.

PROPOSED EVIDENCE

| Witness | Occupation | Estimated Time | Exhibits |
|----------------|-------------------|-----------------------|-----------------|
| John Shoberg | Landman | Affidavit | Approx. 5 |
| Helder Alvarez | Geologist | Affidavit | Approx. 7 |

PROCEDURAL MATTERS

Applicant requests Case Nos. 23047 and 23048 be consolidated for hearing. Applicant will present its cases by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

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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

Action 147579

QUESTIONS

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| Operator: Tascosa Energy Partners, L.L.C 901 W. Missouri Ave Midland, TX 79701 | OGRID: 329748 |
| | Action Number: 147579 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

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| Testimony | |
| <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> |