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. 23094

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 None.

ATTORNEYS

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 N/2 of Section 25, Township 17 South, Range 27 East, Eddy County, New Mexico. The spacing unit will be dedicated to the following wells:

• **Taylorcrest 25 Federal 10H well**, which will be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 25, Township 17 South, Range

27 East, to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 25, Township 17 South, Range 27 East;

- Taylorcrest 25 Federal 20H well, which will be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 25, Township 17 South, Range 27 East, to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 25, Township 17 South, Range 27 East;
- Taylorcrest 25 Federal 70H well, which will be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 25, Township 17 South, Range 27 East, to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 25, Township 17 South, Range 27 East;
- Taylorcrest 25 Federal 21H well, which will be horizontally drilled from a surface hole location in Lot 2 (SW/4 NW/4 equivalent) of Section 30, Township 17 South, Range 28 East, to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 25, Township 17 South, Range 27 East;
- Taylorcrest 25 Federal 71H well, which will be horizontally drilled from a surface hole location in Lot 2 (SW/4 NW/4 equivalent) of Section 30, Township 17 South, Range 28 East, to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 25, Township 17 South, Range 27 East; and
- Taylorcrest 25 Federal 90H well, which will be horizontally drilled from a surface hole location in Lot 2 (SW/4 NW/4 equivalent) of Section 30, Township 17 South, Range 28 East, to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 25, Township 17 South, Range 27 East.

The completed intervals of the wells will be orthodox. The completed interval of the Taylorcrest 25 Federal 10H well will be located within 330' of the quarter-quarter section line separating the N/2 N/2 and the S/2 N/2 of Section 25 to allow for the creation of a 320-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 9 miles southeast of Artesia, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Lance Young	Landman	Affidavit	Approx. 5
Matthew 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 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 ypena@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 153409

QUESTIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	153409
	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.	