

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

**APPLICATION OF PECOS OIL & GAS, LLC  
FOR COMPULSORY POOLING, EDDY  
COUNTY, NEW MEXICO.**

**CASE NO. 23346**

**PECOS OIL & GAS, LLC’S PRE-HEARING STATEMENT**

Pecos Oil & Gas, LLC (“Pecos” 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**

Pecos Oil & Gas, LLC  
 (“Pecos”)

**ATTORNEY**

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**APPLICANT’S STATEMENT OF THE CASE**

In this case, Pecos 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 S/2N/2 of Section 15, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico. Pecos proposes to dedicate the above-referenced spacing unit to the proposed initial **Elm Fee #1H, Elm Fee #2H, Elm Fee #3H, and Elm Fee #4H** wells, all to

be horizontally drilled from a surface location in the NW/4 SE/4 (Unit J) of Section 16, to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 15. The completed interval for each of the wells will comply with statewide setbacks for oil wells. Pecos has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject acreage.

**APPLICANT’S PROPOSED EVIDENCE**


<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Derik Smith, Landman	Self-Affirmed Statement	Approx. 4
Charles Sadler, Geologist	Self-Affirmed Statement	Approx. 5

**PROCEDURAL MATTERS**

Pecos intends to present this case by self-affirmed statement at hearing if unopposed.

Respectfully submitted,

HOLLAND & HART LLP

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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QUESTIONS

Action 189858

**QUESTIONS**

Operator: Redwood Operating LLC PO Box 1370 Artesia, NM 88210	OGRID: 330211
	Action Number: 189858
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>