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

## APPLICATION OF SPUR ENERGY PARTNERS LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NO. 23347

### **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 PARTIES**

### ATTORNEYS

None.

# **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 E/2 of Section 10, Township 17 South, Range 32 East, Lea County, New Mexico. The spacing unit will be dedicated to the following wells (collectively "Wells"):

- Nelson 10 Federal #10H well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 15, Township 17 South, Range 32 East, to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 10, Township 17 South, Range 32 East;
- Nelson 10 Federal #11H well, to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 15, Township 17 South, Range 32 East, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 10, Township 17 South, Range 32 East;
- Nelson 10 Federal #20H well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 15, Township 17 South, Range 32 East, to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 10, Township 17 South, Range 32 East;
- Nelson 10 Federal #60H well, to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 15, Township 17 South, Range 32 East, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 10, Township 17 South, Range 32 East;
- Nelson 10 Federal #70H well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 15, Township 17 South, Range 32 East, to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 10, Township 17 South, Range 32 East; and
- Nelson 10 Federal #71H well, to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 15, Township 17 South, Range 32 East, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 10, Township 17 South, Range 32 East.

The completed interval of the Nelson 10 Federal #20H well will be located within 330' of the quarter-quarter section line separating the E/2 E/2 and E/2 W/2 of Section 10 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 Unit and the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The Wells are located approximately 1.25 miles south-southeast of Maljamar, New Mexico.

#### PROPOSED EVIDENCE

Witness	Occupation	<b>Estimated</b> Time	Exhibits
Lance Young	Landman	Affidavit	Approx. 5
Matthew Van Wie	Geologist	Affidavit	Approx. 4

# **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* 

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

Page 4 of 4

Action 190076

QUESTIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	190076
	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.	