

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

**APPLICATION OF XTO ENERGY INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 23604

APPLICANT'S PRE-HEARING STATEMENT

XTO Energy Inc. ("XTO") (OGRID No. 5380), the applicant in the above-referenced case, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

XTO Energy Inc.

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paul M. Vance
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

OTHER PARTIES

Apache Corporation

ATTORNEY

Earl E. DeBrine, Jr.
Deana Bennett
Jamie L. Allen
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
earl.debrine@modrall.com
deana.bennett@modrall.com
Jamie.allen@modrall.com

APPLICANT’S STATEMENT OF CASE

XTO seeks an order pooling all uncommitted interests in the stratigraphic equivalent of the top of the Bone Spring formation to base of the Second Bone Spring interval underlying a standard 633.36-acre horizontal spacing unit comprised of the W2 equivalent of irregular Sections 30 and 31, Township 19 South, Range 35 East, NMPM, Lea County, New Mexico. Said horizontal spacing unit will be initially dedicated to the following proposed wells:

- **Perla Verde 31 State Com 201H, Perla Verde 31 State Com 401H, and Perla Verde 31 State Com 403H** wells to be horizontally drilled with first take points in the SW4SW4 equivalent (Lot 4) of irregular Section 31 and last take points in the NW4NW4 equivalent (Lot 1) of irregular Section 30; and
- **Perla Verde 31 State Com 203H and Perla Verde 31 State Com 402H** wells to be horizontally drilled with first take points in the SE4SW4 (Unit N) of irregular Section 31 and last take points in the NE4NW4 (Unit C) of irregular Section 30.

The completed interval for the Perla Verde 31 State Com 403H is expected to remain within 330 feet of the offsetting quarter-quarter sections or equivalent tracts to allow inclusion of these tracts in a horizontal well standard spacing unit pursuant to NMAC 19.15.16.15.B.

XTO has sought and been unable to obtain voluntary agreement for the development of these lands from all the mineral owners in the proposed spacing unit.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Bryan J. Cifuentes, Landman	Self-affirmed Statement	Approx. 6
Paul Brown, Geologist	Self-affirmed Statement	Approx. 5

PROCEDURAL MATTERS

XTO plans to present this case by self-affirmed statements if the opposition to this application is withdrawn prior to hearing.

Respectfully submitted,

HOLLAND & HART LLP

A handwritten signature in blue ink, appearing to read "Michael H. Feldewert", is written over a horizontal line.

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Paula M. Vance

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

agrarkin@hollandhart.com

jbroggi@hollandhart.com

pmvance@hollandhart.com

ATTORNEYS FOR XTO ENERGY INC.

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Earl E. DeBrine, Jr.
Deana Bennett
Jamie L. Allen
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
earl.debrine@modrall.com
deana.bennett@modrall.com
Jamie.allen@modrall.com

Attorneys for Apache Corporation

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Michael H. Feldewert

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

Action 245146

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 245146
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.