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

# APPLICATION OF EOG RESOURCES, INC. FOR APPROVAL OF THE PADRON STATE BS-WC UNIT, EDDY COUNTY, NEW MEXICO.

**CASE NO. 23794** 

## **EOG RESOURCES, INC.'S PRE-HEARING STATEMENT**

EOG Resources, Inc. ("EOG") submits this Pre-Hearing Statement pursuant to the rules

of the Oil Conservation Division.

## **APPEARANCES**

### **APPLICANT**

EOG Resources, Inc.

# **ATTORNEY**

Michael H. Feldewert Adam G. Rankin Paul M. Vance Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com

# **APPLICANT'S STATEMENT OF CASE**

EOG seeks an order from the Division approving the proposed Padron State BS-WC Unit.

The proposed Unit Area consists of approximately 10,874.14-acres of the following state

and fee lands situated in Eddy County, New Mexico:

## Township 24 South, Range 27 East, N.M.P.M.

Section 14: ALL Section 22: ALL Section 23: ALL Section 26: ALL Section 27: ALL Section 34: ALL Section 35: ALL Section 36: ALL

### Township 25 South, Range 27 East, N.M.P.M.

Section 1: Lot 1, Lot 2, Lot 3, Lot 4, S2N2, S2 Section 2: Lot 1, Lot 2, Lot 3, Lot 4, S2N2, S2 Section 3: Lot 1, Lot 2, Lot 3, Lot 4 S2N2, S2 Section 9: ALL Section 10: ALL Section 11: ALL Section 14: ALL Section 15: ALL Section 22: ALL

The unitized interval includes the Bone Spring and Wolfcamp formations below the proposed unit area. Certain existing Bone Spring and Wolfcamp wells identified in the filed application will be excluded from the proposed Unit.

EOG expects to obtain approval of the proposed Unit Agreement by a sufficient percentage of the interest owners to provide effective control of unit operations. EOG has met with the New Mexico State Land Office and had received preliminary approval of this unit.

### APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Riker Everett, Landman	Affidavit	Approx. 4
Brandon Swain, Geologist	Affidavit	Approx. 3

#### PROCEDURAL MATTERS

EOG does not expect opposition to this matter and intends to present this case by self-

affirmed statements.

Respectfully submitted, HOLLAND & HART LLP

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