

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

**APPLICATIONS OF CIMAREX ENERGY CO.  
FOR A HORIZONTAL SPACING UNIT  
AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 23448-23455**

**APPLICATIONS OF CIMAREX ENERGY CO.  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 23594-23601**

**APPLICATIONS OF READ & STEVENS, INC.  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 23508-23523**

**NOTICE OF SUPPLEMENTAL EXHIBIT C-12**

Read & Stevens, Inc. (“Read and Stevens”), gives notice that it is filing the attached supplemental exhibit for acceptance into the record.

**Supplemental Exhibit C-12** includes a signed letter of support from Stephen K. Marks, President of Marks Oil, Inc. (“Marks Oil”) and James O. Wilbanks, President of Wilbanks Reserve Corporation (“Wilbanks”), in which both have voluntarily committed their interests to Read & Stevens as a result of having observed the contested hearing. Based on their support, Read & Stevens now has the majority working interest ownership and support in the Wolfcamp across all of their proposed Bane and Joker units (44.4197%, compared to Cimarex’s 41.7955%); and has increased their working interest ownership and support in the Bone Spring across all of their proposed Bane and Joker units (36.7533%, compared to Cimarex’s 50.2277%).

This information was provided to the Division by a representative of Marks Oil and Wilbanks and is being filed on the record for the benefit and knowledge of all parties involved in these contested cases.

Respectfully submitted,

HOLLAND & HART LLP



---

Michael H. Feldewert  
Adam G. Rankin  
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  
pmvance@hollandhart.com

**ATTORNEYS FOR READ & STEVENS, INC. &  
PERMIAN RESOURCES OPERATING, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Darin C. Savage  
Andrew D. Schill  
William E. Zimsky  
214 McKenzie Street  
Santa Fe, New Mexico 87501  
darin@abadieschill.com  
andrew@abadieschill.com  
bill@abadieschill.com

***Attorneys for Cimarex Energy Co.***

Blake C. Jones  
1780 Hughes Landing Blvd., Suite  
750  
The Woodlands, TX 77380  
blake.jones@steptoe-johnson.com

***Attorney for Northern Oil and Gas, Inc.***

Sealy Cavin, Jr.  
Scott S. Morgan  
Brandon D. Hajny  
P. O. Box 1216  
Albuquerque, NM 87103  
(505) 243-5400  
scavin@cilawnm.com  
smorgan@cilawnm.com  
bhajny@cilawnm.com

***Attorneys for Sandstone Properties, LLC***

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
[jimbruce487@gmail.com](mailto:jimbruce487@gmail.com)  
jamesbruc@aol.com

***Attorney for MRC Permian Company and  
Foran Oil Company***



---

Adam G. Rankin

# Supplemental Exhibit C-12



300 N. MARIENFELD STREET, SUITE 1000  
MIDLAND, TX 79701

OFFICE 432.695.4222  
FAX 432.695.4063

September 29, 2023

Marks Oil, Inc.  
1775 N. Sherman Street, Suite 2015  
Denver, CO 80203

**RE: Joker Development**  
Township 20 South, Range 34 East, Lea Co., New Mexico  
Sections 5 & 8

To Whom It May Concern,

The purpose of this letter is to allow Marks Oil, Inc. ("Marks") as an impacted working interest owner within the below referenced development, the opportunity to make reference to its opinion on preferred development strategy.

WHEREAS, Marks observed the contested hearing between Permian Resources Operating as operator for Read & Stevens, Inc. ("Permian") and Cimarex Energy Company ("Cimarex") that took place from August 9th, 2023 to August 11th, 2023.

WHEREAS, on February 17, 2023, Permian proposed a potash development area encompassing sections 5 & 8 of T20S-R34E (the "Joker" project). Permian subsequently sent formal Joker well proposals out in March subsequent to Cimarex's filing for compulsory pooling on the Permian project area.

To provide a very brief summary of Permian's development

- **Joker:** Twenty-Four (24) wells proposed, including four (4) falling in the 3<sup>rd</sup> Bone Spring formation and four (4) in the Wolfcamp A formation.

WHEREAS, Marks owns working interests in both the Bone Spring and Wolfcamp formations that are not equal and would be impacted if a well permitted in one formation was draining hydrocarbons from the other formation.

WHEREAS, Marks has the option of asserting its opinion of Permian's development of the Joker unit, including Permian's plan to co-develop the 3<sup>rd</sup> Bone spring and Wolfcamp A formations together.

Respectfully,

Travis Macha  
Senior Landman

CC:  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

The undersigned herein acknowledges the importance of thoughtfully evaluating the co-development of the 3<sup>rd</sup> Bone Spring Formation along with the Wolfcamp XY in and around the vicinity of the referenced Joker unit and supports the scientific exploration of the two formations together, with consideration for the varying ownership interests in each formation.

**Marks Oil, Inc.**

By: 

Printed Name: Stephen K. Marks, President

Date: October 2, 2023



300 N. MARIENFELD STREET, SUITE 1000  
MIDLAND, TX 79701

OFFICE 432.695.4222  
FAX 432.695.4063

September 29, 2023

Wilbanks Reserve Corporation  
450 E 17<sup>th</sup> Ave., Suite 220  
Denver, CO 80203

**RE: Joker Development**  
Township 20 South, Range 34 East, Lea Co., New Mexico  
Sections 5 & 8

To Whom It May Concern,

The purpose of this letter is to allow Wilbanks Reserve Corporation ("Wilbanks"), as an impacted working interest owner within the below referenced development, the opportunity to make reference to its opinion on preferred development strategy.

WHEREAS, Wilbanks observed the contested hearing between Permian Resources Operating as operator for Read & Stevens, Inc. ("Permian") and Cimarex Energy Company ("Cimarex") that took place from August 9, 2023 to August 11, 2023.

WHEREAS, on February 17, 2023, Permian proposed a potash development area encompassing Sections 5 & 8 of T20S-R34E (the "Joker" project). Permian subsequently sent formal Joker well proposals out in March subsequent to Cimarex's filing for compulsory pooling on the Permian project area.

To provide a very brief summary of Permian's development:

- **Joker:** Twenty-Four (24) wells proposed, including four (4) falling in the 3<sup>rd</sup> Bone Spring formation and four (4) in the Wolfcamp A formation.

WHEREAS, Wilbanks owns working interests in both the Bone Spring and Wolfcamp formations that are not equal and would be impacted if a well permitted in one formation was draining hydrocarbons from the other formation.

WHEREAS, Wilbanks has the option of asserting its opinion of Permian's development of the Joker unit, including Permian's plan to co-develop the 3<sup>rd</sup> Bone Spring and Wolfcamp A formations together.

Respectfully,

Travis Macha  
Senior Landman

CC:  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

The undersigned herein acknowledges the importance of thoughtfully evaluating the co-development of the 3<sup>rd</sup> Bone Spring Formation along with the Wolfcamp XY (aka Upper Wolfcamp) in and around the vicinity of the referenced Joker unit and supports the scientific exploration of the two formations together, with consideration for the varying ownership interests in each formation.

**Wilbanks Reserve Corporation**

By: \_\_\_\_\_

Printed Name: James O. Wilbanks, President

Date: September 29, 2023