

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

**APPLICATION OF ALPHA ENERGY
PARTNERS, LLC FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO**

CASE NOS. 22171-22172

**ALPHA ENERGY PARTNERS LLC'S
CONSOLIDATED PRE-HEARING STATEMENT**

Alpha Energy Partners, LLC (“AEP” or “Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

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STATEMENT OF THE CASE

In **Case No. 22171**, AEP seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Sections 19 and 20, Township 22 South, Range 27 East, Eddy County, New Mexico. The unit will be dedicated to following wells: **The Dude 19/20 Fee 201H**, to be horizontally drilled from a surface location in the NE/4NE/4 (Unit A) of Section 20 to a bottom hole location in the NW/4NW/4 (Unit D) of Section 19; and **The Dude 19/20 Fee 202H**, to be horizontally drilled from a surface location in the NE/4NE/4 (Unit A) of Section 20 to a bottom hole location in the SW/4NW/4 (Unit E) of Section 19. The wells are located in the Purple Sage; Wolfcamp Gas Pool (98220) and will comply with the Special Pool Rules identified in Order No. R-14262.

In **Case No. 22172**, AEP seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of the S/2 of Sections 19 and 20, Township 22 South, Range 27 East, Eddy County, New Mexico. The unit will be dedicated to following wells: **The Dude 19/20 Fee 203H**, to be horizontally drilled from a surface location in the SW/4SW/4 (Unit M) of Section 21 to a bottom hole location in the NW/4SW/4 (Unit L) of Section 19; and **The Dude 19/20 Fee 204H**, to be horizontally drilled from

a surface location in the SW/4SW/4 (Unit M) of Section 21 to a bottom hole location in the SW/4SW/4 (Unit M) of Section 19. The completed intervals of the wells are located in the Purple Sage; Wolfcamp Gas Pool (98220) and will comply with the Special Pool Rules identified in Order No. R-14262.

Also to be considered 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 Wells, and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately 1.6 miles southeast of Carlsbad, New Mexico. Because the Wells are located in proximity to the Carlsbad Brine Well, it is AEP's understanding that the Division intends to impose permit conditions regarding the Wells.

PROPOSED EVIDENCE

<u>Witness</u>	<u>Occupation</u>	<u>Estimated Time</u>	<u>Exhibits</u>
Riley Morris	Landman	Affidavit	Approx. 7
Jason McClain	Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Applicant requests that these cases be consolidated for hearing and intends to present these matters by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2023, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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QUESTIONS

Action 284431

QUESTIONS

Operator: Alpha Energy Partners LLC PO Box 10701 Midland, TX 79702	OGRID: 330859
	Action Number: 284431
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<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>