

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

**APPLICATION OF FLAT CREEK RESOURCES, LLC  
FOR COMPULSORY POOLING AND NOTICE OF  
OVERLAPPING SPACING UNIT,  
EDDY COUNTY, NEW MEXICO**

**Case No. 24259**

**APPLICATION OF FLAT CREEK RESOURCES, LLC  
FOR COMPULSORY POOLING AND NOTICE OF  
OVERLAPPING SPACING UNIT,  
EDDY COUNTY, NEW MEXICO**

**Case No. 24260**

**APPLICATION OF FLAT CREEK RESOURCES, LLC  
FOR COMPULSORY POOLING AND NOTICE OF  
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EDDY COUNTY, NEW MEXICO**

**Case No. 24262**

**APPLICATION OF FLAT CREEK RESOURCES, LLC  
FOR COMPULSORY POOLING AND NOTICE OF  
OVERLAPPING SPACING UNIT,  
EDDY COUNTY, NEW MEXICO**

**Case No. 24263**

**PRE-HEARING STATEMENT**

Applicant FLAT CREEK RESOURCES, LLC (“Flat Creek”) provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

**APPLICANT**

FLAT CREEK RESOURCES, LLC

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**STATEMENT OF THE CASE**

**Case No. 24259:** *Application of Flat Creek Resources, LLC for Compulsory Pooling and Notice of Overlapping Spacing Unit, Eddy County, New Mexico.* Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted mineral interests in the Bone Spring formation (WILLOW LAKE; BONE SPRING, WEST [96415]) in a standard 320-acre, more or less, horizontal spacing and proration unit (“HSU”), comprised of the N/2 N/2 of Sections 22 and 23 (“2-Mile HSU”), Township 24 South, Range 26 East, in Eddy County, New Mexico and, as an alternative, a standard 240-acre, more or less, HSU, comprised of the N/2 N/2 of Section 22 and the N/2 NW/4 of Section 23 (“Alternative HSU”), Township 24 South, Range 26 East, in Eddy County, New Mexico, if timing issues arise with securing the Bureau of Land Management lease for the N/2 NE/4 of Section 23. Applicant proposes to drill the following 2-mile well in the HSU: **Jurnegan Fed Com BS2 #1H** well, to be horizontally drilled from a surface

hole location approximately 965' FNL and 610' FWL of Section 22, T24S-R26E to a bottom hole location approximately 440' FNL and 100' FEL of Section 23, T24S-R26E. In the alternative, Flat Creek proposes to drill the **Jurnegan Fed Com BS2 #1H** well, from a surface hole location approximately 965' FNL and 610' FWL of Section 22, T24S-R26E to a bottom hole location approximately 440' FNL and 2540' FWL of Section 23, T24S-R26E as a 1.5-mile lateral in the Alternative HSU. The completed intervals and first and last take points in either HSU will meet statewide setback requirements for horizontal oil wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and land are approximately 6 miles North East of Whites City, New Mexico.

**Case No. 24260: *Application of Flat Creek Resources, LLC for Compulsory Pooling and Notice of Overlapping Spacing Unit, Eddy County, New Mexico*** Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted mineral interests in the Bone Spring formation (WILLOW LAKE; BONE SPRING, WEST [96415]) in a standard 320-acre, more or less, horizontal spacing and proration unit ("HSU"), comprised of the S/2 N/2 of Sections 22 and 23, Township 24 South, Range 26 East, in Eddy County, New Mexico. Applicant proposes to drill the following 2-mile well in the HSU: **Jurnegan Fed Com BS2 #2H** well, to be horizontally drilled from a surface hole location approximately 995' FNL and 610' FWL of Section 22, T24S-R26E to a bottom hole location approximately 1,870' FNL and 100' FEL of Section 23, T24S-R26E. The completed intervals and first and last take points will meet statewide setback requirements for horizontal oil wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the

well, and a 200% charge for the risk involved in drilling and completing the well. The well and land are approximately 6 miles North East of Whites City, New Mexico.

**Case No. 24262:** Application of Flat Creek Resources, LLC for Compulsory Pooling, Eddy County, New Mexico Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted mineral interests in the Bone Spring formation (WILLOW LAKE; BONE SPRING, WEST [96415]) in a standard 320-acre, more or less, horizontal spacing and proration unit (“HSU”), comprised of the N/2 S/2 of Sections 22 and 23, Township 24 South, Range 26 East, in Eddy County, New Mexico. Applicant proposes to drill the following 2-mile well in the HSU: **Jurnegan Fed Com BS2 #3H** well, to be horizontally drilled from a surface hole location approximately 1,400’ FSL and 725’ FWL of Section 22, T24S-R26E to a bottom hole location approximately 1,900’ FSL and 100’ FEL of Section 23, T24S-R26E. The completed intervals and first and last take points will meet statewide setback requirements for horizontal oil wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and land are approximately 6 miles North East of Whites City, New Mexico.

**Case No. 24263:** *Application of Flat Creek Resources, LLC for Compulsory Pooling, Eddy County, New Mexico.* Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted mineral interests in the Bone Spring formation (WILLOW LAKE; BONE SPRING, WEST [96415]) in a standard 320-acre, more or less, horizontal spacing and proration unit (“HSU”), comprised of the S/2 S/2 of Sections 22 and 23, Township 24 South, Range 26 East, in Eddy County, New Mexico. Applicant proposes to drill the following 2-mile well in the HSU: **Jurnegan Fed Com BS2 #4H** well, to be horizontally drilled from a surface hole location

approximately 1,370' FSL and 725' FWL of Section 22, T24S-R26E to a bottom hole location approximately 440' FSL and 100' FEL of Section 23, T24S-R26E. The completed intervals and first and last take points will meet statewide setback requirements for horizontal oil wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and land are approximately 6 miles North East of Whites City, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT:**

WITNESSES

EXHIBITS

Landman Michael Gregory

7-8

Geologist Thomas M. Anderson

7-8

**PROCEDURAL MATTERS**

Assuming no opposition at the time of hearing, these cases will be presented by affidavit.

Respectfully submitted,

**MONTGOMERY & ANDREWS, PA.**

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*Attorney for Flat Creek Resources, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record, by electronic mail on April 11, 2024:

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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QUESTIONS

Action 332743

**QUESTIONS**

Operator: Flat Creek Resources, LLC 777 Main St. Fort Worth, TX 76102	OGRID: 374034
	Action Number: 332743
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>