

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

**APPLICATIONS OF BTA OIL  
PRODUCERS, LLC TO EXTEND  
TIME TO COMMENCE DRILLING  
OPERATIONS, LEA COUNTY, NEW MEXICO.**

**Case Nos. 24525-24527  
Order Nos. R-22724,  
R-22725, R-22736**

**CONSOLIDATED PRE-HEARING STATEMENT**

Applicant BTA Oil Producers, LLC (“BTA”), submits its Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPLICANT**

BTA Oil Producers, LLC

**ATTORNEYS**

Dana S. Hardy  
Jaclyn M. McLean  
Hinkle Shanor LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
Phone: (505) 982-4554  
dhardy@hinklelawfirm.com  
jmclean@hinklelawfirm.com

**INTERESTED PARTY**

None at this time.

**ATTORNEY**

**STATEMENT OF THE CASES**

In Case Nos. 24525, 24526, and 24527, BTA requests a one (1) year extension of time to commence drilling the Capitan 22301 28-33 State Com #9H, Capitan 22301 28-33 State Com #10H, and Capitan 22301 28-33 State Com #11H wells (“Wells”). The Division issued Order Nos. R-22724, R-22725, and R-22736 on June 7, 2023, approving the Wells and designating BTA operator of the Units and the Wells. Good cause exists for the Division to grant a one (1) year of extension of time for BTA to commence drilling the Wells because BTA’s ability to drill the Wells

has been delayed by limited gas takeaway capacity in the area. BTA requests that the Division extend the deadline to commence drilling the Wells to June 7, 2025.

**PROPOSED EVIDENCE**

| <b>Witness</b>     | <b>Occupation</b> | <b>Estimated Time</b> | <b>Exhibits</b> |
|--------------------|-------------------|-----------------------|-----------------|
| Adams<br>Davenport | Landman           | Affidavit             | Approx. 2       |

**PROCEDURAL MATTERS**

Applicant intends to consolidate these cases for hearing and will present the cases by affidavit if there is no opposition to its applications.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy  
 Dana S. Hardy  
 Jaclyn M. McLean  
 P.O. Box 2068  
 Santa Fe, NM 87504-2068  
 Phone: (505) 982-4554  
 Facsimile: (505) 982-8623  
 dhardy@hinklelawfirm.com  
 jmclean@hinklelawfirm.com  
 Counsel for BTA Oil Producers, LLC

**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 356502

**QUESTIONS**

|   |  |
|---|--|
| Operator:<br>BTA OIL PRODUCERS, LLC<br>104 S Pecos<br>Midland, TX 79701 | OGRID:<br>260297   |
|   | Action Number:<br>356502                                 |
|   | Action Type:<br>[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> |