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

APPLICATIONS OF XTO HOLDINGS, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NOS. 24577-24578 & 24580-24581

# XTO HOLDINGS, LLC'S CONSOLIDATED PRE-HEARING STATEMENT

XTO Holdings, LLC ("XTO" or "Applicant"), the applicant in the above-referenced matters, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

## **APPEARANCES**

## **APPLICANT**

#### **ATTORNEY**

XTO Holdings, LLC ("XTO")

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

## **APPLICANT'S STATEMENT OF THE CASE**

Under these consolidated cases, XTO seeks orders pooling all uncommitted record title owners in the Bone Spring formation (Willow Lake, Bone Spring, Southeast [96217]) underlying the referenced acreage, all in Township 25 South, Range 29 East, NMPM, Eddy County, New Mexico, as follows:

- Under Case No. 24577, XTO seeks to pool all uncommitted owners in a standard 320-acre, more or less, horizontal well spacing unit comprised of the E/2 W/2 of Sections 10 and 15, currently dedicated to the producing Corral Canyon 10-15 Fed Com 10H (API No. 30-015-46325) well, drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 10, with a first take point in the NE/4 NW/4 (Unit C) of Section 10 and a last take point in the SE/4 SW/4 (Unit N) of Section 15.
- Under Case No. 24578, XTO seeks to pool all uncommitted owners in a standard 320-acre, more or less, horizontal well spacing unit comprised of the E/2 E/2 of Sections 10 and 15, currently dedicated to the producing Corral Canyon 10-15 Fed Com 12H (API No. 30-015-45429) well, drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 10, with a first take point in the NE/4 NE/4 (Unit A) of Section 10 and a last take point in the SE/4 SE/4 (Unit P) of Section 15.
- Under Case No. 24580, XTO seeks to pool all uncommitted owners in a standard 320-acre, more or less, horizontal well spacing unit comprised of the W/2 W/2 of Sections 10 and 15, currently dedicated to the producing Corral Canyon 10-15 Fed Com 21H (API No. 30-015-43718) well, drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 3, with a first take point in the NW/4 NW/4 (Unit D) of Section 10 and a last take point in the SW/4 SW/4 (Unit M) of Section 15.
- Under Case No. 24581, XTO seeks to pool all uncommitted owners in a standard 240-acre, more or less, horizontal well spacing unit comprised of the W/2 SE/4 of Section 10 and the W/2 E/2 of Section 15, currently dedicated to the producing Corral Canyon Fed Com 220H (API No. 30-015-45592) well, drilled from a surface location in the NW/4 SE/4 (Unit J) of Section 10, with a first take point in

the NW/4 SE/4 (Unit J) of Section 10 and a last take point in the SW/4 SE/4 (Unit O) of Section 15.

The completed interval for the wells will comply with statewide setbacks for oil wells. XTO has sought and been unable to obtain the signatory approval on the federal communization agreements from all the record title owners in one federal lease covering the subject spacing unit, NMNM-144093.

# **APPLICANT'S PROPOSED EVIDENCE**

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Vincent Cuccerre, Landman	Self-Affirmed Statement	Approx. 4
Marilyn Zorn, Geologist	Self-Affirmed Statement	Approx. 4

# **PROCEDURAL MATTERS**

XTO requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By:

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR XTO HOLDINGS, 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

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 356607

## **QUESTIONS**

Operator:	OGRID:
XTO ENERGY, INC	5380
6401 Holiday Hill Road	Action Number:
Midland, TX 79707	356607
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	