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

# APPLICATION OF SPUR ENERGY PARTNERS LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

**CASE NO. 24609** 

# **PRE-HEARING STATEMENT**

Spur Energy Partners LLC ("Spur" or "Applicant") submits its Pre-Hearing Statement

pursuant to the rules of the Oil Conservation Division.

# APPLICANT

#### **ATTORNEYS**

Spur Energy Partners LLC

Dana S. Hardy Jaclyn 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**

ATTORNEYS

None.

# STATEMENT OF THE CASE

Applicant applies for an order pooling all uncommitted interests in the Yeso formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the S/2 N/2 and N/2 S/2 of Section 14, Township 17 South, Range 32 East, Lea County, New Mexico ("Unit"). The spacing unit will be dedicated to the following wells ("Wells"):

a. The Miller 14 Federal Com 10H, Miller 14 Federal Com 20H, and Miller 14
Federal Com 70H wells, to be drilled from a surface hole location in the SW/4
NW/4 (Unit E) of Section 13, Township 17 South, Range 32 East, to bottom hole

locations in the SW/4 NW/4 (Unit E) of Section 14, Township 17 South, Range 32 East; and

b. The Miller 14 Federal Com 21H and Miller 14 Federal Com 71H wells, to be drilled from a surface hole location in the NW/4 SW/4 (Unit L) of Section 13, Township 17 South, Range 32 East, to bottom hole locations in the NW/4 SW/4 (Unit L) of Section 14, Township 17 South, Range 32 East.

The completed intervals of the Wells will be orthodox. The completed interval of the Miller 14 Federal Com 10H well will be located within 330' of the quarter-quarter section line separating the S/2 N/2 and N/2 S/2 of Section 14 to allow for the creation of a 320-acre standard horizontal spacing unit.

Also to be considered in each case 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 Unit and the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The Wells are located approximately 2.64 miles southeast of Maljamar, New Mexico.

# **PROPOSED EVIDENCE**

Witness	Occupation	<b>Estimated</b> Time	Exhibits
Lance Young	Landman	Affidavit	Approx. 5
Matthew Van Wie	Geologist	Affidavit	Approx. 4

# PROCEDURAL MATTERS

Applicant will present this matter by affidavit if there is no opposition.

.

Respectfully submitted,

# HINKLE SHANOR LLP

/s/ Dana S. Hardy Dana S. Hardy Jaclyn 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 Spur Energy Partners 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

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	360813
	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.	

QUESTIONS

Action 360813