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

APPLICATION OF E.G.L. RESOURCES, INC. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NOS. 24719 24720

PRE-HEARING STATEMENT

E.G.L. Resources, Inc. ("E.G.L." or "Applicant") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT ATTORNEYS

E.G.L. Resources, Inc. 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 ATTORNEY

MRC Permian Company Michael H. Feldewert

Adam G. Rankin Paula M. Vance Holland & Hart, LLP Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com pmvance@hollandhart.com

STATEMENT OF THE CASE

In Case No. 24719, E.G.L. seeks an order pooling all uncommitted interests in the First Bone Spring interval of the Bone Spring formation underlying a 640-acre, more or less, standard

horizontal spacing unit comprised of the E/2 of Sections 24 and 25, Township 18 South, Range 32 East, Lea County, New Mexico. The Unit will be dedicated to the following proposed wells:

- a. the LTK 24-25 Fed Com 101H and 102H wells, to be drilled from surface hole locations in the NE/4 NE/4 (Unit A) of Section 24 to bottom hole locations in the SW/4 SE/4 (Unit O) of Section 25; and
- b. the LTK 24-25 Fed Com 103H well, to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 24 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 25.

The completed intervals of the Wells will be orthodox. The completed interval of the LTK 24-25 Fed Com 102H well will be located within 330' of the quarter-quarter section line separating the E/2 E/2 and W/2 E/2 of Sections 24 and 25 to allow for the creation of a 640-acre standard horizontal spacing unit. There is a depth severance in the Bone Spring formation within the Unit. Accordingly, Applicant seeks to pool interests in the First Bone Spring interval from the top of the Bone Spring formation to a depth of approximately 8,700' TVD.

In Case No. 24720, E.G.L. seeks an order pooling all uncommitted interests in the Second Bone Spring interval of the Bone Spring formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of the E/2 of Sections 24 and 25, Township 18 South, Range 32 East, Lea County, New Mexico. The Unit will be dedicated to the following proposed wells:

a. the LTK 24-25 Fed Com 201H and 203H wells, to be drilled from surface hole locations in the NE/4 NE/4 (Unit A) of Section 24 to bottom hole locations in the SW/4 SE/4 (Unit O) of Section 25; and

b. the LTK 24-25 Fed Com 205H well, to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 24 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 25.

The completed intervals of the Wells will be orthodox. The completed interval of the LTK 24-25 Fed Com 203H well will be located within 330' of the quarter-quarter section line separating the E/2 E/2 and W/2 E/2 of Sections 24 and 25 to allow for the creation of a 640-acre standard horizontal spacing unit. There is a depth severance in the Bone Spring formation within the Unit. Accordingly, Applicant seeks to pool the interests in the Second Bone Spring interval from a depth of approximately 8,700' to 9,580' TVD.

Also to be considered will be the cost of drilling and completing the Wells and the allocation of the costs and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately 8 miles south of Maljamar, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Matthew Langhoff	Landman	Affidavit	Approx. 5
Matthew Pardee	Geologist	Affidavit	Approx. 6

PROCEDURAL MATTERS

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

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 E.G.L. Resources, Inc.

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 374187

QUESTIONS

Operator:	OGRID:
E G L RESOURCES INC	173413
P.O. Box 10886	Action Number:
Midland, TX 79702	374187
	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.		