BEFORE THE OIL CONSERVATION DIVISION EXAMINER HEARING OCTOBER 10, 2024

EXHIBIT PACKET IN SUPPORT OF
JOINT AMENDED APPLICATION OF PRIDE ENERGY COMPANY AND
CIMAREX ENERGY CO. FOR THE CREATION OF A SPECIAL POOL, A
WOLBONE POOL, IN PARTS OF SECTIONS 12 AND 13
TOWNSHIP 19 SOUTH, RANGE 34 EAST, LEA COUNTY, NEW
MEXICO, PURSUANT TO ORDER NO. R-23132 AND TO REOPEN
CASE NOS. 22853 AND 23295

Case Nos. 24721 and 24736:

Creation of a Wolfbone Pool

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TAB 1

Reference for Case Nos. 24721 and 24736 Joint Amended Application for a Special Pool OCD Order No. R-23132

JOINT AMENDED APPLICATION FOR A SPECIAL POOL

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

APPLICATION OF CIMAREX ENERGY CO. FOR THE CREATION OF A SPECIAL POOL, A WOLFBONE POOL, PURSUANT TO ORDER NO. R-23132, TO REOPEN CASE NOS. 22853 AND 23295 AND TO APPROVE A POOLING APPLICATION FOR THE WOLFBONE POOL, LEA COUNTY, NEW MEXICO.

Case No. 24721

APPLICATION OF PRIDE ENEGY COMPANY FOR CREATION OF A SPECIAL WOLFBONE OIL POOL IN PARTS OF SECTION 12 AND 13, TOWNSHIP 19 SOUTH RANGE 34 EAST, NMPM, LEA COUNTY, NEW MEXICO.

Case No. 24736

JOINT AMENDED APPLICATION FOR A SPECIAL POOL

Pride Energy Company ("Pride") and Cimarex Energy Co. ("Cimarex") (collectively, "applicants") apply for an order creating a special Wolfbone Pool, an oil pool, by means of the vertical contraction of the Scharb; Bone Spring Pool (Code 55610) in a manner that avoids overlap with the proposed special pool. In support thereof, the applicants state the following:

1. In Case No. 22853 Pride sought the pooling of all uncommitted mineral interest owners in the Wolfcamp formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 12 and the W/2W/2 of Section 13, Township 19 South, Range 34 East, N.M.P.M., Lea County, New Mexico, for purposes of drilling its proposed Go State Com. Well No. 401H, which had been assigned the WC-025 G-09S203435D; Wolfcamp Pool/Pool Code 92847 for purposes of the pooling application.

- 2. In Case No. 23295 Cimarex sought the pooling of all uncommitted mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 12 and the W/2W/2 of Section 13 for purposes of drilling its three proposed Showbiz wells, which are in the Scharb; Bone Spring Pool/Pool Code 55610.
- 3. These matters were consolidated for hearing and were heard on July 20, 2023. Order No. R-23132 was issued by the Division on May 8, 2024, denying both applications. The order held that (a) the Third Bone Spring Sand and the Upper Wolfcamp were a common source of supply, without a frac baffle between them, (b) neither Pride nor Cimarex requested a special pool to accommodate communication between the zones, and (c) the well proposals in the two cases would lead to either an impairment of correlative rights or illegal allocation.
- 4. Order No. R-23132 allowed the parties to re-open the hearing record for purposes of creating a special pool. Neither party appealed the order *de novo* to the Commission.
- 5. Pride and Cimarex discussed this matter after the hearing, and initially filed separate applications for the creation of Wolfbone Pool. Cimarex filed its application in Case No. 24721, and Pride filed its application in Case No. 24736. However, based on subsequent feedback from the Division, Pride and Cimarex are filing a joint application for the creation of a Wolfbone pool covering the subject lands, to be designated as the Scharb; Wolfbone Pool, as described herein.
- 6. Applicants propose the upper limit of the Scharb; Wolfbone Pool to be the stratigraphic equivalent of the top of the Third Bone Spring Sand, located at approximately 10,775 feet measured depth, to the stratigraphic equivalent of the base of the Wolfcamp A shale, located at approximately 11,306 measured depth, as found in the compensated neutron density log of the Super Cobra State Com.

Well No. 1H (API No. 30-025-41987), which has a surface location 190 feet FSL and 660 feet FEL of Section 13, Township 19 South, Range 34 East, N.M.P.M.

- 7. Applicants propose that the Wolfbone Pool proposed herein initially be limited to 320 acres, being the W/2W/2 of Section 12 and the W/2W/2 of Section 13, Township 19 South, Range 34 East, N.M.P.M., Lea County, New Mexico.
- 8. Based on the findings in Order No. R-23132, applicants believe that only one well per standard well unit in the Wolfbone Pool is necessary and warranted to develop the pool. Whether the well should be located in the either the Third Bone Spring or the Wolfcamp is to be decided by subsequent application and hearing before the Division.
- 9. In the W/2W/2 of Section 12 and the W/2W/2 of Section 13 the vertical extent of the proposed Wolfbone Pool incorporates an ownership depth severance that is located at the boundary line between the top of the Wolfcamp formation and the base of the Bone Spring formation. Therefore, allocation of production shall be determined by either (a) voluntary agreement among interest owners, or (b) failing voluntary agreement, by the Division upon proper application and hearing. Applicants submit that the finding of open communication between the Third Bone Spring and Upper Wolfcamp (see ¶ 7-9, Order No. R-23132) prohibits, in the present case, the practice of drilling wells above and below the severance, a practice which is only applicable when there are natural barriers along the severance that segregate production from the two formations. Here there are no frac baffles, thus an allocation formula pursuant to (a) or (b) above are the available options for protecting correlative rights.
 - 10. The granting of this application will prevent waste and protect correlative rights.

WHEREFORE, applicants request that, after notice and hearing for the October 10, 2024, docket, the Division enter its order:

A. Re-opening the hearing record under Order No. R-23132 for consideration of

creating the proposed Scharb; Wolfbone Pool;

B. Creating the proposed Scharb; Wolfbone Pool and providing for the vertical contraction

of the Scharb; Bone Spring Pool (Code 55610), in a manner that avoids overlap with the

proposed Scharb; Wolfbone Pool. The base of the Scharb; Bone Spring (Code 55610) should

be contracted to approximately 10,775 feet, a depth equivalent to the top of the Third Bone

Spring Sand, and since currently there is no Wolfcamp pool assigned to the Subject Lands, the

base of the Scharb; Wolfbone Pool should be located at approximately 11,306 feet, which is the

base of the Wolfcamp A shale, as found in the compensated well log of the Super Cobra State

Com. Well No. 1H (API No. 30-025-41987);

C. Limiting the original areal extent of the proposed Scharb; Wolfbone Pool, an oil pool,

to the W/2W/2 of Section 12 and the W/2W/2 of Section 13; and

D. Granting such further relief as the Division deems proper and necessary.

Respectfully submitted,

/s/ James Bruce

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

jamesbruc@aol.com

Attorney for Pride Energy Company

ABADIE & SCHILL PC

/s/ Darin C. Savage

Darin Savage
Andrew Schill
William E. Zimsky
214 McKenzie Street
Santa Fe, New Mexico 87501
(970) 385-4401
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

Attorneys for Cimarex Energy Co.

Joint Amended Application of Pride Energy Company and Cimarex Energy Co. for the Creation of a Special Pool, a Wolfbone Pool, in parts of Sections 12 and 13, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico, Pursuant to Order No. R-23132 and to Re-open Case Nos. 22853 and 23295. Applicants in the above-styled cause seeks an order from the Division creating a special pool, the Scharb; Wolfbone Pool, an oil pool, pursuant to Order No. R-23132, within the W/2 W/2 of Sections 12 and 13, in Township 19 South, Range 34 East, NMPM, Lea County, New Mexico ("Subject Lands"). Applicants propose that Division's statewide rules apply to spacing units and well locations within the Scharb; Wolfbone Pool. The vertical extent of the proposed Scharb; Wolfbone Pool will be the stratigraphic equivalent of the top of the Third Bone Spring Sand, located at approximately 10,775 feet measured depth, to the stratigraphic equivalent of the base of the Wolfcamp A shale, located at approximately 11,306 feet measured depth, as found in the compensated neutron density log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987), which has a surface location 190 feet FSL and 660 feet FEL of Section 13, Township 19 South, Range 34 East N.M.P.M. Applicants will seek an order from the Division for the vertical extent by requesting the contraction of the Scharb; Bone Spring Pool (Pool Code 55610) in a manner that avoids overlap with the proposed Scharb; Wolfbone Pool. The base of the Scharb; Bone Spring (Code 55610) should be contracted to approximately 10,775 feet, a depth equivalent to the top of the Third Bone Spring Sand, and since currently a Wolfcamp pool has not been assigned to the Subject Lands, the base of the Scharb; Wolfbone Pool should be located at approximately 11,306 feet, which is the base of the Wolfcamp A shale, as found in the compensated well log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987). Also to be considered will be the re-opening of the record for Case Nos. 22853 and 23295. The Subject Lands are located approximately 27 miles southwest of Hobbs, New Mexico.

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

IN THE MATTER OF APPLICATION FOR COMPULSORY POOLING SUBMITTED BY

CASE NO. 22853

PRIDE ENERGY COMPANY

IN THE MATTER OF APPLICATION FOR **COMPULSORY POOLING AND A** HORIZONTAL SPACING UNITSUBMITTED BY **CIMAREX ENERGY COMPANY**

CASE NO. 23295

ORDER NO. R-23132

ORDER

The Director of the New Mexico Oil Conservation Division ("OCD"), having heard this matter through legal and technical Hearing Examiners on July 20, 2023, and after considering the testimony, evidence, and recommendation of the Hearing Examiners, issues the following Order.

FINDINGS OF FACT

- 1. Pride Energy Company ("Pride") submitted an application ("Pride Application") to compulsory pool the uncommitted oil and gas interests within the spacing unit as seen in Pride's exhibits.
- 2. Cimarex Energy Company ("Cimarex") submitted an application ("Cimarex Application") to compulsory pool the uncommitted oil and gas interests within the spacing unit as seen in Cimarex's exhibits.
- 3. Both parties are proposing to develop the W/2 W/2 of Sections 12 and 13, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico. Pride's plan for these lands is named the "Go State". Cimarex's plan for these lands is named the "Showbiz".
- 4. Pride's application proposed drilling one well in the Wolfcamp formation.
- 5. Cimarex's application proposed drilling three wells in the Bone Spring formation.
- 6. The lands proposed for drilling by both parties lacks natural barriers that would prevent communication between the Third Bone Spring Sand and Upper Wolfcamp, thereby creating a single reservoir or common source of supply.
- 7. Cimarex's geologist Staci Mueller affidavit testimony stated that:

Paragraph 9: ... These help to show that the 3rd Sand & Wolfcamp XY behave as one geomechanical reservoir...

Paragraph 10: ... With a separation of 100 ft between Cimarex's proposed 3rd Sand landing and Pride's Upper Wolfcamp landing, and no indication of frac baffles in between, Pride's Wolfcamp well will produce mostly out of the 3rd Sand.

Paragraph 12: ... This is due to the lack of frac baffles between the 3rd Sand and Upper Wolfcamp...

8. Pride's contract Geologist Harvin Broughton was questioned and answered as follows:

Q: Okay. Did you analyze whether or not there's any baffling or natural barriers between the third Bone Spring and the upper Wolfcamp?

A: Yes. And I don't believe there are any -- any baffles. And when I think, more specifically, they're -- they're frack baffles, you know, or frack barriers... I -- I agree that there are no -- you know, and I looked at the Cimarex geology presentation also and I am in agreement with that.

(See Tr. Pg 141: lines 13-19, 24-25 and Pg 142: line 1)

Q: Would you say that without a baffle, you'd have communication between the formation and the reservoir?

A: I would say it's likely. But I -- to a degree, I couldn't -- couldn't say.

(See Tr. Pg 142: lines 17-21)

- 9. Pride and Cimarex both acknowledged that wells completed in the Bone Spring and Wolfcamp formations will share production from both the Bone Spring and Wolfcamp formations.
- 10. Neither Pride nor Cimarex requested in their applications or at hearing the creation of a special pool to accommodate the communication of the Bone Springs and Wolfcamp formations such that there is a common supply.
- 11. Neither applicant requested a special pool order accounting for the common source of supply, or provided notice of a special pool request.

CONCLUSIONS OF LAW

12. OCD has jurisdiction to issue this Order pursuant to NMSA 1978, Section 70-2-17.

ORDER NO. R-23132

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- 13. A "Pool" is defined as "an underground reservoir containing a common accumulation of oil or gas. Each zone of a general structure, which zone is completely separated from other zones in the structure, is covered by the word pool as used in 19.15.2 NMAC through 19.15.39 NMAC. "Pool" is synonymous with "common source of supply" and with "common reservoir". 19.15.2.7.P(5) NMAC.
- 14. Chapter 70-2-12 B of the Oil and Gas Act requires OCD:
 - (2) to prevent crude petroleum oil, natural gas or water from escaping from strata in which it is found into other strata;
 - (7) to require wells to be drilled, operated and produced in such manner as to prevent injury to neighboring leases or properties;
 - (12) to determine the limits of any pool producing crude petroleum oil or natural gas or both and from time to time redetermine the limits;
- 15. 19.15.16.9 NMAC requires that during the drilling of an oil well, injection well or other service well, the operator shall seal and separate the oil, gas and water strata above the producing or injection horizon to prevent their contents from passing into other strata.
- 16. 19.15.12.9 NMAC requires that an operator shall produce each pool as a single common source of supply and complete, case, maintain and operate wells in the pool so as to prevent communication within the well bore with other pools. An operator shall at all times segregate oil or gas produced from each pool. The combination commingling of production, before marketing, with production from other pools without division approval is prohibited.
- 17. OCD has the authority to create special pool orders when required pursuant to 19.15.2.9 NMAC, when proper notice has been satisfied.
- 18. The evidence currently in the record before OCD indicates that Pride's and Cimarex' proposals would lead to either impairment of correlative rights or illegal allocation. Both parties testify that their production would extend outside of their respective pools and impact other pools, as such both requests extend outside of a standard compulsory pooling request.
- 19. Neither application can be approved while remaining in compliance with OCD rules and regulations that require pool segregation, prevent waste and protect correlative rights.

ORDER

20. OCD hereby denies both applications except insofar as either applicant or both applicants choose to propose a special pool, a Wolfbone pool, that would account for the lack of frac baffles between the Bone Spring and Wolfcamp formations in

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- this area. The record is left open for such a proposal and will prompt a reopening of the hearing record on both applications.
- 21. It is not necessary for the parties to repeat the testimony or resubmit the exhibits regarding their original proposed plans; they may refer to existing evidence to the extent needed to justify the special pool request.
- 22. OCD retains jurisdiction of this matter for the entry of such orders as may be deemed necessary.

Date: <u>4/8/24</u>

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

DYLAN MEUGE DIRECTOR (Acting)

DMF/jag

ORDER NO. R-23132

TAB 2

Exhibit A: Self-Affirmed Statement of Isabella Sikes, Landman Exhibit A-1: Self-Affirmed Statement of Matthew Pride, Landman

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

APPLICATION OF CIMAREX ENERGY CO. FOR THE CREATION OF A SPECIAL POOL, A WOLFBONE POOL, PURSUANT TO ORDER NO. R-23132, TO REOPEN CASE NOS. 22853 AND 23295 AND TO APPROVE A POOLING APPPLICATION FOR THE WOLFBONE POOL, LEA COUNTY, NEW MEXICO.

Case No. 24721

APPLICATION OF PRIDE ENERGY COMPANY FOR CREATION OF A SPECIAL WOLFBONE OIL POOL IN PARTS OF SECTION 12 AND 13, TOWNSHIP 19 SOUTH RANGE 34 EAST, NMPM, LEA COUNTY, NEW MEXICO.

Case No. 24736

SELF-AFFIRMED STATEMENT OF ISABELLA (BELLA) SIKES

- I, Isabella Sikes, state and affirm the following:
- 1. I am over the age of eighteen years and have the capacity to execute this Self-Affirmed Statement, which is based on my personal knowledge.
- 2. I am employed as a Landman with Coterra Energy, Inc., and its subsidiary Cimarex Energy Co. ("Cimarex"), the applicant in this case, and I am familiar with the subject application and the lands involved.
- 3. I graduated in 2023 from Texas Tech University with a Bachelor of Business Administration in Energy Commerce with an emphasis in Petroleum Land Management. I have worked at Cimarex for approximately a little more than 1 year and my work has focused on New Mexico's Permian Basin. I have testified previously before the New Mexico Oil Conservation



Division ("Division" or "OCD") and have been recognized as an expert witness in petroleum land matters.

- 4. This Statement is submitted to the Division in support of the Joint Amended Application for a Special Pool submitted by Cimarex and Pride Energy Company ("Pride") (collectively referred to as "Applicants") for the creation of a Wolfbone Pool, pursuant to Order No. R-23132 ("Wolfbone Application") in Case Nos. 24721 and 24736. This Wolfbone Application proposes and requests that a new Wolfbone Pool be designated as the Scharb: Wolfbone Pool and created to encompass the Third Bone Spring formation and the Upper Wolfcamp formation, underlying the W/2 W/2 of Section 12 and the W/2 W/2 of Section 13, all in Township 19 South, Range 34 East, NMPM, Lea County ("Subject Lands").
- 5. The Applicants have requested the hearing record under Order No. R-23132 be reopened for consideration of creating the proposed Scharb; Wolfbone Pool. The proposed Scharb; Wolfbone Pool would be created by providing for the vertical contraction of the Scharb; Bone Spring Pool (Code 55610), in a manner that avoids overlap with the proposed Scharb; Wolfbone Pool. The base of the Scharb; Bone Spring (Code 55610) should be contracted to approximately 10,745 feet, a depth equivalent to the top of the Third Bone Spring Sand, and since currently there is no Wolfcamp pool assigned to the Subject Lands, the base of the Scharb; Wolfbone Pool should be located at approximately 11,400 feet, which is the base of the Wolfcamp A shale, as found in the compensated well log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987). The original area of the proposed Scharb; Wolfbone Pool, an oil pool, would be limited to the W/2W/2 of Section 12 and the W/2W/2 of Section 13.
- 6. For service of notice by letter and publication, I worked with the law firm of Abadie & Schill P.C., to create a list of names and addresses for the uncommitted working interest owners

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in the Subject Lands as reflected in the mailing list in the mailing and notice exhibits herein. In

compiling addresses, I updated the lists of uncommitted owners by conducting a diligent search of

the public records in Lea County, New Mexico, where the proposed wells are located, and did

online computer searches to locate the contact information for parties entitled to notification. I also

provided Abadie & Schill with names and addresses of operators of units in the Bone Spring and

Wolfcamp within one mile of the outer boundary of the Subject Lands. I was informed that Abadie

& Schill coordinated with Pride's counsel to complete the mailing lists and provide notice to the

owners and operators pursuant to the requirements of 19.15.4.12.A(4)(b), as reflected in the

mailing and notice exhibits herein.

[Signature page follows]

Signature page of Self-Affirmed Statement of Bella Sikes:

I understand that this Self-Affirmed Statement will be used as written testimony before the Division in Case Nos. 24721 and affirm that my testimony herein is true and correct, to the best of my knowledge and belief and made under penalty of perjury under the laws of the State of New Mexico.

dyabella Sikey
Isabella Sikes

10/3/2024

Date Signed

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BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF CIMAREX ENERGY CO. FOR CREATION OF A SPECIAL WOLFBONE OIL POOL IN PARTS OF SECTIONS 12 AND 13, TOWNSHIP 19 SOUTH, RANGE 34 EAST, NMPM, LEA COUNTY, NEW MEXICO.

Case No. 24721

JOINT APPLICATION OF PRIDE ENERGY COMPANY FOR CREATION OF A SPECIAL WOLFBONE OIL POOL IN PARTS OF SECTIONS 12 AND 13, TOWNSHIP 19 SOUTH, RANGE 34 EAST, NMPM, LEA COUNTY, NEW MEXICO.

Case No. 24736

VERIFIED STATEMENT OF MATTHEW L. PRIDE

Matthew L. Pride, being duly sworn upon his oath, deposes and states:

- I am a landman for Pride Energy Company ("Pride"), and have personal knowledge of the matters stated herein.
- I have previously been qualified by the Division as an expert petroleum landman.
 I am also part owner of Pride, and have over 30 years of experience in the oil and gas business.
- This application is filed pursuant to the terms of Order No. R-23132, and also seeks to re-open Case Nis. 22853 and 23295.
- 4. Pride and Cimarex Energy Co. ("Cimarex") agree on the formation of the Scharb;
 Wolfbone Pool, and have agreed that its general rules and vertical boundaries should be as follows:

Applicants propose that Division's statewide rules apply to spacing units and well locations within the Scharb; Wolfbone Pool. The vertical extent of the proposed Scharb; Wolfbone Pool will be the stratigraphic equivalent of the top of the Third Bone Spring Sand, located at approximately 10,775 feet measured depth, to the stratigraphic equivalent of the base of the Wolfcamp A shale, located at approximately 11,306 feet measured depth, as found in the



compensated neutron density log (**Exhibit** A) of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987), which has a surface location 190 feet FSL and 660 feet FEL of Section 13, Township 19 South, Range 34 East, N.M.P.M. Applicants will seek an order from the Division on the vertical extent by requesting the contraction of the Scharb; Bone Spring Pool (Pool Code 55610) in a manner that avoids overlap with the proposed Scharb; Wolfbone Pool. The base of the Scharb; Bone Spring (Code 55610) should be contracted to approximately 10,775 feet, a depth equivalent to the top of the Third Bone Spring Sand, and since currently a Wolfcamp pool has not been assigned to the Subject Lands, the base of the Scharb; Wolfbone Pool should be located at approximately 11,306 feet, which is the base of the Wolfcamp A shale, as found in the compensated well log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987).

See Joint Application.

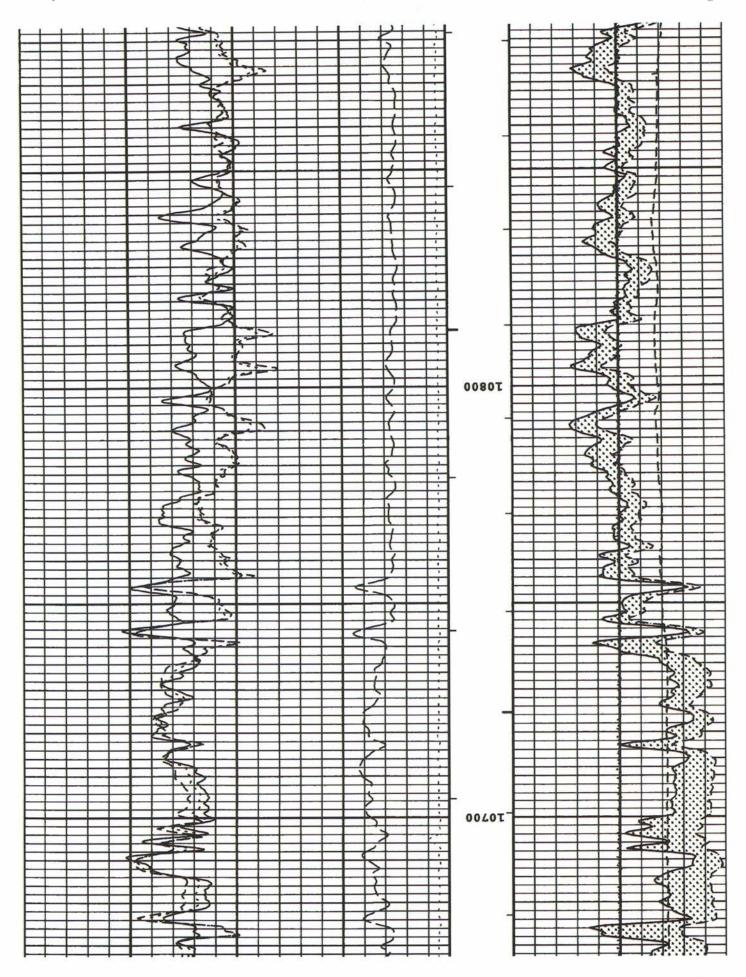
- 5. The pool's horizontal extent should initially be comprised of the W/2W/2 of Section 12 and the W/2W/2 of Section 13, Township 19 South, Range 34 East, N.M.P.M., Lea County, New Mexico.
- 6. Pride provided its attorney with a listing of working interest owners in the proposed pool, and a list of operators of existing Bone Spring and Wolfcamp wells within a mile of the W/2W/2 of Section 12 and the W/2W/2 of Section 13. I understand that Cimarex also provided to Pride's attorney its list of offset operators and an additional list of interest owners to the subject acreage. It is our understanding that the list of interest owners was primarily of overriding owners and record title owner. We are confident that proper notice was given under Division Rules.

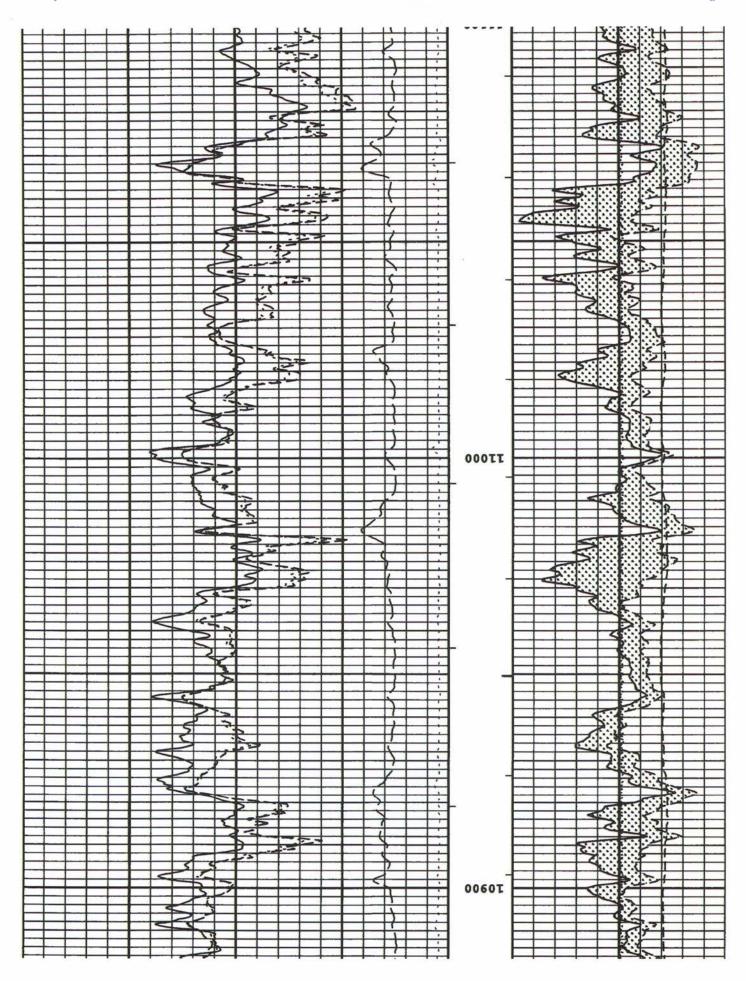
Granting the Joint Application is in the interests of conservation and prevention of 7. waste.

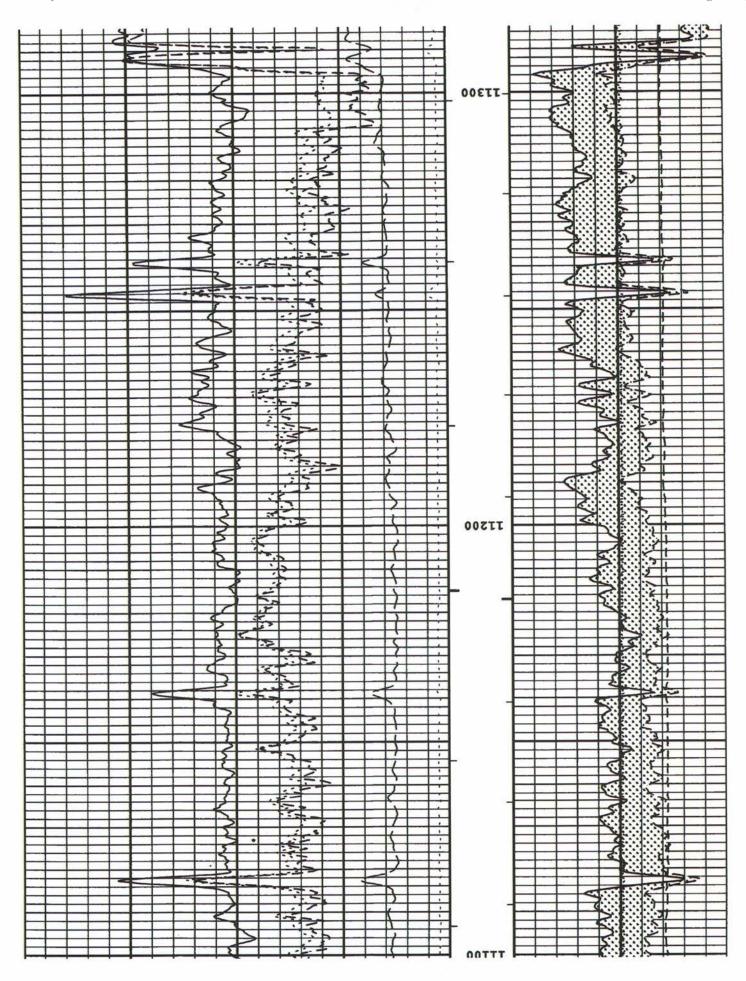
I understand that this Self-Affirmed Statement will be used as written testimony in these cases. I affirm that my testimony in paragraphs 1 through 7 above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date written next to my signature below. Matthew L. Pride

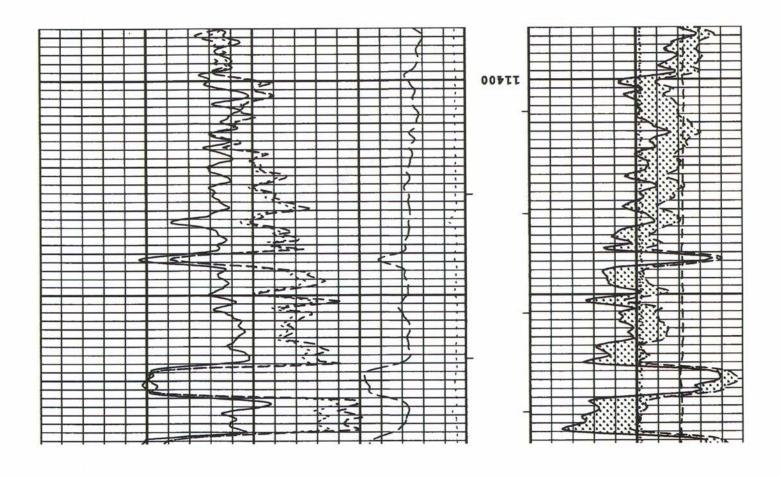
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TAB 3

Exhibit B: Self-Affirmed Statement of Staci Frey, Geologist Exhibit B-1: Vertical Extent of Wolfbone Pool Proposal

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

APPLICATION OF CIMAREX ENERGY CO. FOR THE CREATION OF A SPECIAL POOL, A WOLFBONE POOL, PURSUANT TO ORDER NO. R-23132, TO REOPEN CASE NOS. 22853 AND 23295 AND TO APPROVE A POOLING APPLICATION FOR THE WOLFBONE POOL, LEA COUNTY, NEW MEXICO.

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APPLICATION OF PRIDE ENEGY COMPANY FOR CREATION OF A SPECIAL WOLFBONE OIL POOL IN PARTS OF SECTION 12 AND 13, TOWNSHIP 19 SOUTH RANGE 34 EAST, NMPM, LEA COUNTY, NEW MEXICO.

Case No. 24736

SELF-AFFIRMED STATEMENT OF STACI FREY

- I, Staci Frey, state and affirm the following:
- 1. I am over the age of 18, and I have personal knowledge of the matters stated herein.
- 2. I am employed as a petroleum geologist for Cimarex Energy Co. ("Cimarex"), and I am familiar with the subject application and the geology involved.
- 3. I have testified previously before the Oil Conservation Division ("Division" or "OCD") as an expert petroleum geologist; my credentials have been made a matter of record, and I have been qualified as an expert by the Division.
 - a. I have a Bachelor of Science Degree in Geophysical Engineering from Colorado
 School of Mines, and a Master of Science Degree in Geophysics from Colorado
 School of Mines.
 - b. I have worked on New Mexico Oil and Gas matters since July 2018.

EXHIBIT

- 4. This Statement is submitted to the Division in support of the Joint Amended Application for a Special Pool submitted by Cimarex and Pride Energy Company ("Pride") (collectively referred to as "Applicants") for the creation of a Wolfbone Pool, pursuant to Order No. R-23132 ("Wolfbone Application") in Case Nos. 24721 and 24736. This Wolfbone Application proposes and requests that a new Wolfbone Pool be designated as the Scharb: Wolfbone Pool and created to encompass the Third Bone Spring formation and the Upper Wolfcamp formation, underlying the W/2 W/2 of Section 12 and the W/2 W/2 of Section 13, all in Township19 South, Range 34 East, NMPM, Lea County ("Subject Lands").
- 5. The vertical extent of the Scharb; Wolfbone Pool is defined by the stratigraphic equivalent of the top of the Third Bone Spring Sand to the base of the Wolfcamp A Shale. The Wolfbone Application uses the Super Cobra State Com Well No. 1H (API No. 30-025-41987) as the reference well such that the base of the Scharb; Bone Spring (Code 55610) should be contracted to approximately 10,745 feet, a depth equivalent to the top of the Third Bone Spring Sand, and since currently there is no Wolfcamp pool assigned to the Subject Lands, the base of the Scharb; Wolfbone Pool should be located at approximately 11,400 feet, which is the base of the Wolfcamp A Shale, as found in the compensated neutron density well log of the Super Cobra State Com Well No. 1H (API No. 30-025-41987).
- 6. Exhibit B-1, attached hereto, provides a visual representation of the vertical extent of the Scharb: Wolfbone Pool based on the Quail Ridge 32 State 2 Well as the reference well which shows the top of the Third Bone Spring Sand at 10,620 feet and the base of the Wolfcamp A Shale at 11,225 feet. These depths are stratigraphically equivalent to those depths in Paragraph 5 that are described and referenced based on the Super Cobra State Com Well No. 1H.

7. Exhibit B-1 was prepared by me, and the foregoing statement is true and correct to the best of my knowledge and belief.

[Signature page follows]

Signature page of Self-Affirmed Statement of Staci Frey:

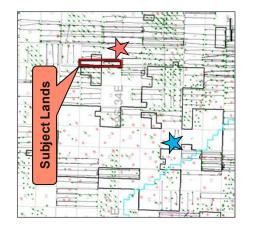
I understand that this Self-Affirmed Statement will be used as written testimony before the Division in Case Nos. 24721 and affirm that my testimony herein is true and correct, to the best of my knowledge and belief and made under penalty of perjury under the laws of the State of New Mexico.

Staci Frey

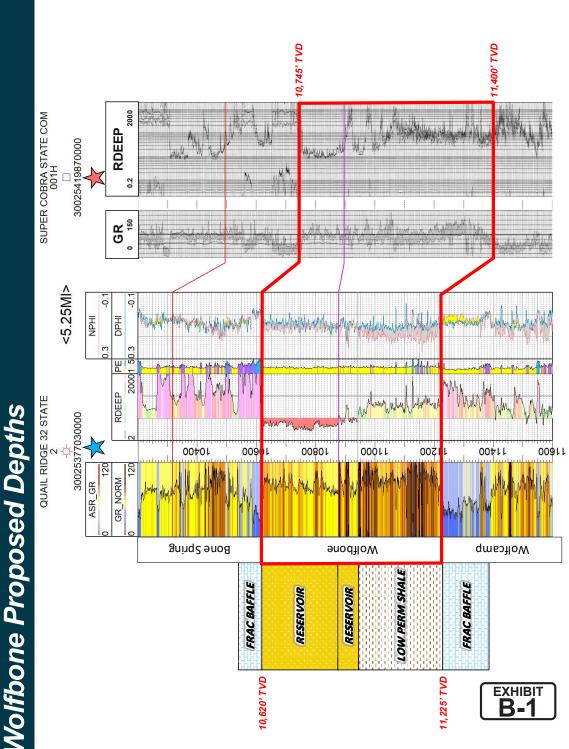
Date Signed

10/2/2024









TAB 4

Exhibit C: Self-Affirmed Statement of Notice, James Bruce Exhibit C-1: Notice Letters And Lists of Owners and Operators

Exhibit C-2: Proof of Mailing

Exhibit C-3: Affidavit of Publication

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

APPLICATION OF CIMAREX ENERGY CO. FOR CREATION OF A SPECIAL WOLFBONE OIL POOL IN PARTS OF SECTIONS 12 AND 13, TOWNSHIP 19 SOUTH, RANGE 34 EAST, NMPM, LEA COUNTY, NEW MEXICO.

Case No. 24721

JOINT APPLICATION OF PRIDE ENERGY COMPANY FOR CREATION OF A SPECIAL WOLFBONE OIL POOL IN PARTS OF SECTIONS 12 AND 13, TOWNSHIP 19 SOUTH, RANGE 34 EAST, NMPM, LEA COUNTY, NEW MEXICO.

Case No. 24736

SELF-AFFIRMED STATEMENT OF NOTICE

COUNTY OF SANTA FE)
) ss
STATE OF NEW MEXICO)

James Bruce deposes and states:

- 1. I am over the age of 18, and have personal knowledge of the matters stated herein.
- 2. I am an attorney for Pride Energy Company.
- 3. Pride Energy Company and Cimarex Energy Co. have conducted a good faith, diligent effort to find the names and correct addresses of the interest owners entitled to receive notice of the applications filed herein.
- 4. Notice of the applications was provided to the interest owners, at their last known addresses, by certified mail. Copies of the notice letter and certified return receipts are attached hereto as Exhibit A.

Notice of the applications was also provided to the offset operators, at their last known addresses, by certified mail. Copies of the notice letter and certified return receipts are attached hereto as Exhibit B.

5. Applicant has complied with the notice provisions of Division Rules.

I understand that this Self-Affirmed Statement will be used as written testimony in this case. I affirm that my testimony in paragraphs 1 through 5 above is true and correct and is made

EXHIBIT

under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date handwritten next to my signature below.

James Bruce

JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213 SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone) (505) 660-6612 (Cell) (505) 982-2151 (Fax)

jamesbruc@aol.com

September 19, 2024

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Persons on Exhibit A

Ladies and gentlemen:

Enclosed is a copy of a joint application, filed with the New Mexico Oil Conservation Division by of Pride Energy Company and Cimarex Energy Co., requesting the following relief:

Cases 24721 and 24736: Joint Amended Application of Pride Energy Company and Cimarex Energy Co. for the Creation of a Special Pool, a Wolfbone Pool, in parts of Sections 12 and 13, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico, Pursuant to Order No. R-23132 and to Re-open Case Nos. 22853 and 23295. Applicants in the above-styled cause seeks an order from the Division creating a special pool, the Scharb; Wolfbone Pool, an oil pool, pursuant to Order No. R-23132, within the W/2W/2 of Sections 12 and 13, in Township 19 South, Range 34 East, NMPM, Lea County, New Mexico ("Subject Lands"). Applicants propose that Division's statewide rules apply to spacing units and well locations within the Scharb; Wolfbone Pool. The vertical extent of the proposed Scharb; Wolfbone Pool will be the stratigraphic equivalent of the top of the Third Bone Spring Sand, located at approximately 10,775 feet measured depth, to the stratigraphic equivalent of the base of the Wolfcamp A shale, located at approximately 11,306 feet measured depth, as found in the compensated neutron density log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987), which has a surface location 190 feet FSL and 660 feet FEL of Section 13, Township 19 South, Range 34 East N.M.P.M. Applicants will seek an order from the Division on the vertical extent by requesting the contraction of the Scharb; Bone Spring Pool (Pool Code 55610) in a manner that avoids overlap with the proposed Scharb; Wolfbone Pool. The base of the Scharb; Bone Spring (Code 55610) should be contracted to approximately 10,775 feet, a depth equivalent to the top of the Third Bone Spring Sand, and since currently a Wolfcamp pool has not been assigned to the Subject Lands, the base of the Scharb; Wolfbone Pool should be located at approximately 11,306 feet, which is the base of the Wolfcamp A shale, as found in the compensated well log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987). Also to be considered will be the re-



opening of the record for Case Nos. 22853 and 23295. The Subject Lands are located approximately 27 miles southwest of Hobbs, New Mexico.

You are interest owners in the W/2W/2 of Section 12 and W/2W/2 of Section 13. This matter is scheduled for hearing at 8:30 a.m. on Thursday, October 10, 2024. The hearing may be attended (a) in person in Pecos Hall of the Wendell Chino Building, 1st Floor, 1220 South St. Francis Drive, Santa Fe New Mexico 87505, or (b) via the WebEx virtual meeting platform. To view the hearing docket and to determine how to participate in an electronic hearing, go to https://www.emnrd.nm.gov/ocd/hearing-info/, or contact Freya Tschantz freya.tschantz@emnrd.nm.gov. You are not required to attend this hearing, but as an owner of an interest who may be affected by the application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from contesting this matter at a later date. A party appearing in a Division case is required by Division Rules to file a Pre-Hearing Statement no later than five business days before the hearing date. This statement may be filed online with the Division at ocd.hearings@emnrd.nm.gov, and should include: The name of the party and his or her attorney; a concise statement of the case; the name(s) of the witness(es) the party will call to testify at the hearing; the approximate time the party will need to present his or her case; and identification of any procedural matters that need to be resolved prior to the hearing. The Pre-Hearing Statement must also be provided to the undersigned.

Very truly yours,

James Bruce

Attorney for Pride Energy Company

ABADIE & SCHILL PC

/s/ Darin C. Savage

Darin C. Savage

Andrew Schill

William E. Zimsky

214 McKenzie Street

Santa Fe, New Mexico 87501

darin@abadieschill.com

ancrew@abadieschill.com

bill@abadieschill.com

Attorneys for Cimarex Energy Co.

Collins & Jones Investments, LLC 508 West Wall Street, Suite 1200 Midland, TX 79701

David W. Cromwell, ssp 2008 Country Club Drive Midland, TX 79701

Deane Durham, ssp P.O. Box 50820 Midland, TX 79710

Earthstone Permian, LLC 300 N. Marienfeld Street, Suite 1000 Midland, TX 79701

Franklin Mountain Energy 3, LLC 44 Cook Street, Suite 100 Denver, CO 80206

Good News Minerals, LLC P.O. Box 50820 Midland, TX 79710

H. Jason Wacker, ssp 5601 Hilcrest Midland, TX 79707

Hanley Petroleum, Inc. P.O. Box 1348 Forth Worth, TX 76101

Kaleb Smith, ssp P.O. Box 50820 Midland, TX 79710

LMC Energy, LLC 550 West Texas Avenue, Suite 945 Midland, TX 79701

Matador Production Company MRC Permian Company 5400 LBJ Freeway, Suite 1500 Dallas, TX 75240 Mewbourne Oil Company 500 West Texas, Suite 1020 Midland, TX 79701

Mike Moylett, ssp P.O. Box 50820 Midland, TX 79710

Mongoose Minerals, LLC 600 West Illinois Avenue Midland, TX 79701

New Mexico State Land Office P.O. Box 1148 Santa Fe, NM 87504

Oak Valley Mineral and Land, LP P.O. Box 50820 Midland, TX 79710

Post Oak Crown IV-B, LLC Post Oak Crown IV, LLC Post Oak Crown Minerals, LLC 5200 San Felipe Houston, TX 77056

Sortida Resources, LLC P.O. Box 50820 Midland, TX 79710

Warren Ventures Ltd. 808 West Wall Street Midland, TX 79701

XTO Holdings, LLC 22777 Springwoods Village Parkway Spring, TX 77389

ZPZ Delaware I, LLC 2000 Post Oak Boulevard, Suite 100 Houston, TX 77056 Buckhorn Energy, LLC Sharktooth Resources, Ltd 1801 Broadway, Suite 1550 Denver, CO 80202

CD Ray Exploration, LLC Charles D. Ray 4 Churchill Way Midland, TX 79705

Chevron U.S.A., Inc. 6301 Deauville Boulevard Midland, Texas 79706

COG Operating LLC
Concho Oil & Gas LLC
Conoco Phillips Company
600 West Illinois Avenue
Midland, TX 79701

Crown Oil Partners IV, LP
Crown Oil Partners V, LP
Crump Energy Partners II, LLC
Crump Family Partnership, Ltd
Mavros Oil Company, LLC
P.O. Box 50820
Midland, TX 79705

Featherstone Development Corporation Prospector, LLC Big Three Energy Group, LLC P.O. Box 429 Roswell, NM 88201

H6 Holdings LP P.O. Box 1212 Midland, TX 79702

LHAH Properties LLC 415 West Wall Street, Ste 1500 Midland, TX 79701 Marathon Oil Permian, LLC Marathon Oil Co. 5555 San Felipe St. Houston, TX 77056

Parrot Head Properties, LLC 1801 West 2nd Street Roswell, NM 88201

Buckhorn Energy, LLC Sharktooth Resources, Ltd 505 North Big Spring Street, Ste 303 Midland, TX 79701

Tarpon Industries Corporation 5211 Preston Drive Midland, TX 79707

TBO Oil & Gas, LLC PO Box 10502 Midland, TX 79702

Warren Ventures, Ltd 808 West Wall Street Midland, TX 79701 JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213 SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone) (505) 660-6612 (Cell) (505) 982-2151 (Fax)

jamesbruc@aol.com

September 19, 2024

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Persons on Exhibit A

Ladies and gentlemen:

Enclosed is a copy of a joint application, filed with the New Mexico Oil Conservation Division by of Pride Energy Company and Cimarex Energy Co., requesting the following relief:

Cases 24721 and 24736: Joint Amended Application of Pride Energy Company and Cimarex Energy Co. for the Creation of a Special Pool, a Wolfbone Pool, in parts of Sections 12 and 13, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico, Pursuant to Order No. R-23132 and to Re-open Case Nos. 22853 and 23295. Applicants in the above-styled cause seeks an order from the Division creating a special pool, the Scharb; Wolfbone Pool, an oil pool, pursuant to Order No. R-23132, within the W/2W/2 of Sections 12 and 13, in Township 19 South, Range 34 East, NMPM, Lea County, New Mexico ("Subject Lands"). Applicants propose that Division's statewide rules apply to spacing units and well locations within the Scharb; Wolfbone Pool. The vertical extent of the proposed Scharb; Wolfbone Pool will be the stratigraphic equivalent of the top of the Third Bone Spring Sand, located at approximately 10,775 feet measured depth, to the stratigraphic equivalent of the base of the Wolfcamp A shale, located at approximately 11,306 feet measured depth, as found in the compensated neutron density log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987), which has a surface location 190 feet FSL and 660 feet FEL of Section 13, Township 19 South, Range 34 East N.M.P.M. Applicants will seek an order from the Division on the vertical extent by requesting the contraction of the Scharb; Bone Spring Pool (Pool Code 55610) in a manner that avoids overlap with the proposed Scharb; Wolfbone Pool. The base of the Scharb; Bone Spring (Code 55610) should be contracted to approximately 10,775 feet, a depth equivalent to the top of the Third Bone Spring Sand, and since currently a Wolfcamp pool has not been assigned to the Subject Lands, the base of the Scharb; Wolfbone Pool should be located at approximately 11,306 feet, which is the base of the Wolfcamp A shale, as found in the compensated well log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987). Also to be considered will be the reopening of the record for Case Nos. 22853 and 23295. The Subject Lands are located approximately 27 miles southwest of Hobbs, New Mexico.

You are operators of offsetting wells completed in the Bone Spring or Wolfcamp formations located within one mile of the W/2W/2 of Section 12 and W/2W/2 of Section 13. This matter is scheduled for hearing at 8:30 a.m. on Thursday, October 10, 2024. The hearing may be attended (a) in person in Pecos Hall of the Wendell Chino Building, 1st Floor, 1220 South St. Francis Drive, Santa Fe New Mexico 87505, or (b) via the WebEx virtual meeting platform. To view the hearing docket and to determine how to participate in an electronic hearing, go to https://www.emnrd.nm.gov/ocd/hearing-info/, or contact Freva Tschantz freya.tschantz@emnrd.nm.gov. You are not required to attend this hearing, but as an owner of an interest who may be affected by the application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from contesting this matter at a later date. A party appearing in a Division case is required by Division Rules to file a Pre-Hearing Statement no later than five business days before the hearing date. This statement may be filed online with the Division at ocd.hearings@emnrd.nm.gov, and should include: The name of the party and his or her attorney; a concise statement of the case; the name(s) of the witness(es) the party will call to testify at the hearing; the approximate time the party will need to present his or her case; and identification of any procedural matters that need to be resolved prior to the hearing. The Pre-Hearing Statement must also be provided to the undersigned.

Very truly yours,

James Bruce

Attorney for Pride Energy Company

ABADIE & SCHILL PC

/s/ Darin C. Savage

Darin C. Savage Andrew Schill

William E. Zimsky

214 McKenzie Street

Santa Fe, New Mexico 87501

darin@abadieschill.com

ancrew@abadieschill.com

bill@abadieschill.com

Attorneys for Cimarex Energy Co.

EXHIBIT A

Earthstone Operating, LLC 300 N. Marienfeld Street, Suite 1000 Midland, TX 79701

Franklin Mountain Energy 3, LLC 44 Cook Street, Suite 100 Denver, CO 80206

Matador Production Company 5400 LBJ Freeway, Suite 1500 Dallas, TX 75240

Mewbourne Oil Company 500 West Texas, Suite 1020 Midland, TX 79701

XTO Energy Inc. 22777 Springwoods Village Parkway Spring, TX 77389

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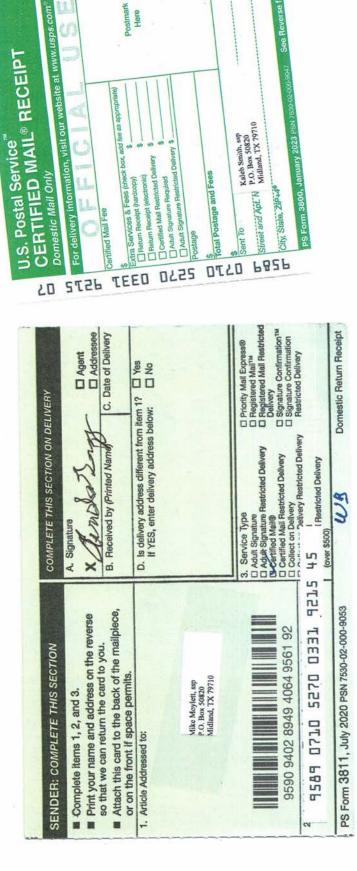
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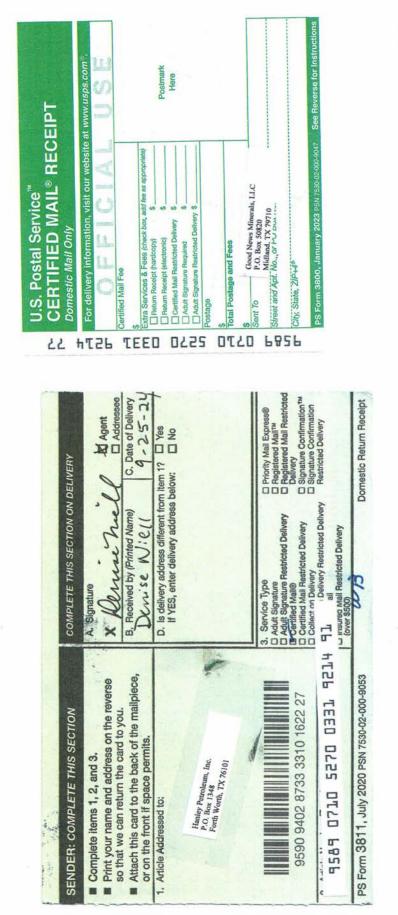
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Affidavit of Publication

STATE OF NEW MEXICO COUNTY OF LEA

I. Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

> Beginning with the issue dated September 25, 2024 and ending with the issue dated September 25, 2024.

Publisher

Sworn and subscribed to before me this 25th day of September 2024.

hAtack

Business Manager

My commission expires

January 29 2972 OF NEW MEXICO (Seal) NOTARY PUBLIC GUSSIE RUTH BLACK **COMMISSION # 1087526** COMMISSION EXPIRES 01/29/2027

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said publication has been made.

LEGAL NOTICE September 25, 2024

NOTICE

NOTICE

To: Interest Owners in the W/2W/2 of Sections 12 and 13: COG Operating LLC, Big Three Energy Group, LLC, Crown Oil Partners IV, LP, Buckhorn Energy, LLC, CD Ray Exploration, LLC, Charles D. Ray, Chevron U.S.A., Inc., Concho Oil & Gas LLC, ConocoPhillips Company, Crown Oil Partners IV, LP, Crown Oil Partners IV, LP, Crown Energy Partners II, LLC, Crump Family Partnership, Ltd, Featherstone Development Corporation, H6 Holdings LP, Hanley Petroleum, LLC, LHAH Properties LLC, Marathon Oil Permian LLC, Marathon Oil Co., Marktooth Resources, Ltd, Tarpon Industries Corporation, TBO Oil & Gas, LLC, and Warren Ventures, Ltd, Collins & Jones Investments, LLC, David W. Cromwell, Deane Durham, Earthstone Permian, LLC, Franklin Mountain Energy 3, LLC, Good News Minerals, LLC, H. Jason Wacker, Hanley Petroleum, Inc., Kaleb Smith, LMC Energy, LLC, Matador Production Company, MRC Permian Company, Mewbourne Oil Company, Mike Moylett, Mongoose Minerals, LLC, New Mexico State Land Office, Oak Valley Mineral and Land, LP, Post Oak Crown IV-B, LLC, Post Oak Crown IV, LLC, Post Oak Crown IV, LLC, Post Oak Crown IV, LLC, and ZPZ Delaware I, LLC, and Offiser Operators: Earthstone Operating, LLC, Franklin Mountain Energy 3, LLC, Matador Production Company, and XTO Energy Inc., or your heirs, devisees, successors, or assigns. Enclosed is a copy of a joint application, filed with the New Mexico Oil Conservation Division by of Pride Energy Company and Cimarex Energy Co., requesting the following relief:

Cases 24721 and 24736: Joint Amended Application of Pride Energy Company and Cimarex Energy Co. for the Creation of a Special Pool, a Wolfbone Pool, in parts of Sections 12 and 13, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico, Pursuant to Order No. R-23132 and to Re-open Case Nos. 22853 and 23295. Applicants in the above-styled cause seeks an order from the Division creating a special pool, the Scharb; Wolfbone Pool, an oil pool, pursuant to Order No. R-23132, within the W/ZW/2 of Sections 12 and 13, in Township 19 South, Range 34 East, NMPM, Lea County, New Mexico ("Subject Lands"). Applicants propose that Division's statewide rules apply to spacing units and well locations within the Scharb; Wolfbone Pool. The vertical extent of the proposed Scharb; Wolfbone Pool will be the stratigraphic equivalent of the top of the Third Bone Spring Sand, located at approximately 10,775 feet measured depth, to the stratigraphic equivalent of the base of the Wolfcamp A shale, located at approximately 11,306 feet measured depth, as lound in the compensated neutron density log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987), which has a surface location 190 feet FSL and 660 feet FEL of Section 13, Township 19 South, Range 34 East N.M.P.M. Applicants will seek an order from the Division on the vertical extent by requesting the contraction of the Scharb; Bone Spring Pool (Pool Code 55610) in a manner that avoids overlap with the proposed Scharb; Wolfbone Pool. The base of the Scharb; Bone Spring (Code 55610) should be contracted to approximately 10,775 feet, a depth equivalent to the top of the Third Bone Spring Sand, and since currently a Wolfcamp pool has not been assigned to the Subject Lands, the base of the Scharb; Wolfbone Pool should be located at approximately 11,306 feet, which is the base of the Wolfcamp A shale, as found in the compensated well log of the Super Cobra State Com. Well No. 1H (API No. 30-025-41987). Also to be considered will be the re-opening of the record for Case Nos

This matter is scheduled for hearing at 8:30 a.m. on Thursday, October 10, 2024. The hearing may be attended (a) in person in Pecos Hall of the Wendell Chino Building, 1st Floor, 1220 South St. Francis Drive, Santa Fe New Mexico 87505, or (b) via the WebEx virtual meeting platform. To view the hearing docket and to determine how to participate in an electronic hearing, go to https://www.emnrd.nm.gov/ocd/hearing-info/, or contact Freya Tschantz at Ireya.lschantz@emnrd.nm.gov. You are not required to attend this hearing, but as an owner of an interest who may be affected by the application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from contesting this matter at a later date. A party appearing in a Division case is required by Division Rules to file a Pre-Hearing Statement no later than five business days before the hearing date. This statement may be filed online with the Division at ocd.hearings@emnrd.nm.gov. and should include: The name of the party and his or her attorney; a concise statement of the case; the name(s) of the witness(es) the party will call to testify at the hearing: The Bro. Hearing. Statement may be provedural matters that need to be resolved prior to the hearing. case; and identification of any procedural matters that need to present his or ner to the hearing. The Pre-Hearing Statement must also be provided to the attorneys for applicants. The Subject Lands are located approximately 15-1/2 miles north-northeast of Halfway, New Mexico.

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JAMES BRUCE JAMES BRUCE, ATTORNEY AT LAW P.O. BOX 1056 SANTA FE, NM 87504