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

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

CASE NO. 24851 Order No. R-22852

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

CASE NO. 24852 Order No. R-22853

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

CASE NO. 24853 Order No. R-22909

CONSOLIDATED PRE-HEARING STATEMENT

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

APPLICANT ATTORNEYS

BTA Oil Producers, LLC Dana S. Hardy

Jaclyn M. McLean Dylan M. Villescas Hinkle Shanor LLP P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com dvillescas@hinklelawfirm.com

INTERESTED PARTY ATTORNEY

None at this time.

STATEMENT OF THE CASES

In Case No. 24851, Applicant requests a one-year extension of time, until September 11, 2025, to commence drilling the well authorized by Order No. R-22852. The Division issued Order

No. R-22852 in Case No. 23662 on September 11, 2023, which: approved a 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 E/2 of Sections 21 and 28, Township 16 South, Range 36 East, Lea County, New Mexico; pooled uncommitted interests within the Pennsylvanian Shale formation underlying the unit; dedicated the unit to the Capitan 22301 28-21 State Com #17H well; and designated Applicant as the operator of the unit and well.

In Case No. 24852, Applicant requests a one-year extension of time, until September 11, 2025, to commence drilling the well authorized by Order No. R-22853. The Division issued Order No. R-22853 in Case No. 23663 on September, 11 2023, which: approved a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Sections 21 and 28, Township 16 South, Range 36 East, Lea County, New Mexico; pooled uncommitted interests within the Pennsylvanian Shale formation underlying the unit; dedicated the unit to the Capitan 22301 28-21 State Com #18H well; and designated Applicant as operator of the unit and well.

In Case No. 24853, Applicant requests a one-year extension of time, until October 6, 2025, to commence drilling the well authorized by Order No. R-22909. The Division issued Order No. R-22909 in Case No. 23664 on October 6, 2024, which: approved a 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 W/2 of Sections 22 and 27, Township 16 South, Range 36 East, Lea County, New Mexico; pooled uncommitted interests within the Pennsylvanian Shale formation underlying the unit; dedicated the unit to the Capitan 22301 27-22 State Com #19H well; and designated Applicant as operator of the unit and well.

Applicant's ability to commence drilling the Capitan 22301 27-22 State Com #17H, #18H, and #19H wells has been delayed due to gas takeaway constraints in the area. Additional gas takeaway capacity is estimated to be operational in the second quarter of 2025. Therefore, good cause exists for the requested extension.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Adams	Landman	Affidavit	Approx. 2
Davenport			

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 Dylan M. Villescas P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

dvillescas@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

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 389797

QUESTIONS

Operator:	OGRID:
BTA OIL PRODUCERS, LLC	260297
104 S Pecos	Action Number:
Midland, TX 79701	389797
	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.	