

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

**AMENDED APPLICATIONS OF FLAT CREEK RESOURCES, LLC
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

Case Nos. 24746 - 24749

PRE-HEARING STATEMENT

Applicant FLAT CREEK RESOURCES, LLC (“Flat Creek”) provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

FLAT CREEK RESOURCES, LLC

ATTORNEY

Sharon T. Shaheen
Spencer Fane LLP
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshaheen@spencerfane.com
ec:dortiz@spencerfane.com

OTHER PARTIES

COTERRA ENERGY, INC.
CIMAREX ENERGY CO.
MAGNUM HUNTER PRODUCTION, INC.

Darin C. Savage
Andrew D. Schill
William E. Zimsky
Abadie & Schill, PC
214 McKenzie Street
Santa Fe, NM 87501
970.385.4401
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

CIVITAS PERMIAN OPERATING, LLC

Ocean Munds-Dry
Michael Rodriguez
309 Johnson Street
Santa Fe, NM 87501
(505) 592-0521
(303) 312-8518
omundsdry@civiresources.com
mrodriguez@civiresources.com

STATEMENT OF THE CASE

Case No. 24746: *Amended Application of Flat Creek Resources, LLC for Compulsory Pooling, Eddy County, New Mexico.* Applicant seeks an order from the Division pooling all uncommitted mineral interests in the Bone Spring formation (Cottonwood Draw; Bone Spring (O) [97494]) down to 8,062' (being 300' above the top of the Wolfcamp Formation, or 8,362') in a standard 240-acre, more or less, horizontal spacing and proration unit ("HSU"), comprised of the E/2 NE/4 of Section 3, Township 25 South, Range 26 East and the E/2 E/2 of Section 34, Township 24 South, Range 26 East, in Eddy County, New Mexico. Applicant proposes to drill the following 1.5-mile well in the HSU: **Bombsite BS Fed Com #1H** well, to be horizontally drilled from a surface hole location approximately 1,885' FSL and 2,526' FEL of Section 3, T25S-R26E to a bottom hole location approximately 100' FNL and 755' FEL of Section 34, T24S-R26E.

Case No. 24747: *Amended Application of Flat Creek Resources, LLC for Compulsory Pooling, Eddy County, New Mexico.* Applicant seeks an order from the Division pooling all uncommitted mineral interests in the Bone Spring formation (Cottonwood Draw; Bone Spring (O) [97494]) down to 8,062' (being 300' above the top of the Wolfcamp Formation, or 8,362') in a standard 240-acre, more or less, horizontal spacing and proration unit ("HSU"), comprised of the W/2 NE/4 of Section 3, Township 25 South, Range 26 East and the W/2 E/2 of Section 34, Township 24 South, Range 26 East, in Eddy County, New Mexico. Applicant proposes to drill the following 1.5-mile well in the HSU: **Bombsite BS Fed Com #2H** well, to be horizontally drilled from a surface hole location approximately 2,110' FSL and 2,556' FEL of Section 3, T25S-R26E to a bottom hole location approximately 100' FNL and 1,990' FEL of Section 34, T24S-R26E.

Case No. 24748: Amended Application of Flat Creek Resources, LLC for Compulsory Pooling, Eddy County, New Mexico. Applicant seeks an order from the Division pooling all uncommitted mineral interests in the Bone Spring formation down to 8,062' (being 300' above the top of the Wolfcamp Formation, or 8,362') (Cottonwood Draw; Bone Spring (O) [97494]) in a standard 240-acre, more or less, horizontal spacing and proration unit ("HSU"), comprised of the E/2 NW/4 of Section 3, Township 25 South, Range 26 East and the E/2 W/2 of Section 34, Township 24 South, Range 26 East, in Eddy County, New Mexico. Applicant proposes to drill the following 1.5-mile well in the HSU: **Bombsite BS Fed Com #3H** well, to be horizontally drilled from a surface hole location approximately 2,075' FSL and 2,586' FEL of Section 3, T25S-R26E to a bottom hole location approximately 100' FNL and 2,044' FWL of Section 34, T24S-R26E.

Case No. 24749: Amended Application of Flat Creek Resources, LLC for Compulsory Pooling, Eddy County, New Mexico. Applicant seeks an order from the Division pooling all uncommitted mineral interests in the Bone Spring formation down to 8,062' (being 300' above the top of the Wolfcamp Formation, or 8,362') (Cottonwood Draw; Bone Spring (O) [97494]) in a standard 240-acre, more or less, horizontal spacing and proration unit ("HSU"), comprised of the W/2 NW/4 of Section 3, Township 25 South, Range 26 East and the W/2 W/2 of Section 34, Township 24 South, Range 26 East, in Eddy County, New Mexico. Applicant proposes to drill the following 2-mile well in the HSU: **Bombsite BS Fed Com #4H** well, to be horizontally drilled from a surface hole location approximately 2,075' FSL and 2,616' FEL of Section 3, T25S-R26E to a bottom hole location approximately 100' FNL and 590' FWL of Section 34, T24S-R26E.

The completed intervals and first and last take points of all proposed wells will meet statewide setback requirements for horizontal oil and gas wells. Also to be considered will be the

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record, by electronic mail on October 24, 2024:

Darin C. Savage
Andrew D. Schill
William E. Zimsky
ABADIE & SCHILL, PC
214 McKenzie Street
Santa Fe, NM 87501
(970) 385-4401
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

*Attorneys for Coterra Energy, Inc., and its
subsidiaries, including Cimarex Energy Co.
and Magnum Hunter Production, Inc.*

Ocean Munds-Dry
Michael Rodriguez
309 Johnson Street
Santa Fe, NM 87501
(505) 592-0521
(303) 312-8518
omundsdry@civiresources.com
mrodriguez@civiresources.com

Attorneys for Civitas Permian Operating, LLC

/s/ Sharon S. Shaheen
Sharon T. Shaheen

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

Action 395736

QUESTIONS

Operator: Flat Creek Resources, LLC 777 Main St. Fort Worth, TX 76102	OGRID: 374034
	Action Number: 395736
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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