

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

**APPLICATION OF EOG RESOURCES, INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 21856, 21857, 21858, 21859

EOG RESOURCES, INC.'S CONSOLIDATED PRE-HEARING STATEMENT

EOG Resources, Inc. ("EOG") submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

EOG Resources, Inc.

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In **Case No. 21856**, EOG seeks an order from the Division pooling all uncommitted interests in the Bone Spring formation (RED HILLS; BONE SPRING, EAST 97369) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 4 and 9, Township 25 South, Range 34 East, NMPM, Lea County, New Mexico. EOG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The **Holyfield 9 Fed Com #303H well** (API No. 30-025-pending) to be drilled from a surface hole location in SW/4 SE/4 (Unit O) of said Section 9 to a bottom hole location in the NE/4 NE/4 (Unit A) of said Section 4; and
- The **Holyfield 9 Fed Com #304H well** (API No. 30-025-pending), and the **Holyfield 9 Fed Com #305H well** (API No. 30-025-pending), both of which are to be drilled from a common surface hole location in SW/4 SE/4 (Unit O) of said Section 9 to bottom hole locations in the NW/4 NE/4 (Unit B) of said Section 4.

The completed interval for the proposed **Holyfield 9 Fed Com #304H well** will remain within 330 feet of the quarter-quarter line separating the E/2 E/2 from the W/2 E/2 of Sections 4 and 9 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

In **Case No. 21857**, EOG seeks an order from the Division pooling all uncommitted interests in the Bone Spring formation (RED HILLS; BONE SPRING, EAST 97369) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 4 and 9, Township 25 South, Range 34 East, NMPM, Lea County, New Mexico. EOG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The **Holyfield 9 Fed Com #308H well** (API No. 30-025-pending), to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of said Section 9 to a bottom hole location in the NE/4 NW/4 (Unit C) of said Section 4;
- The **Holyfield 9 Fed Com #309H well** (API No. 30-025-pending) to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of

said Section 9 to a bottom hole location in the NW/4 NW/4 (Unit D) of said Section 4; and

- The **Holyfield 9 Fed Com #310H well** (API No. 30-025-pending), and the **Holyfield 9 Fed Com #311H well** (API No. 30-025-pending), to be drilled from a surface hole location in SW/4 SW/4 (Unit M) of said Section 9 to a bottom hole location in the NW/4 NW/4 (Unit D) of said Section 4.

The completed interval for the proposed **Holyfield 9 Fed Com #309H well** will remain within 330 feet of the quarter-quarter line separating the W/2 W/2 from the E/2 W/2 of Sections 4 and 9 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

In **Case No. 21858**, EOG seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S253402N;WOLFCAMP [98116]) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 4 and 9, Township 25 South, Range 34 East, NMPM, Lea County, New Mexico. EOG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The **Holyfield 9 Fed Com #701H well** (API No. 30-025-47695), and the **Holyfield 9 Fed Com #702H well** (API No. 30-025-47696), both of which are to be drilled from a common surface hole location in SE/4 SE/4 (Unit P) of said Section 9 to bottom hole locations in the NE/4 NE/4 (Unit A) of said Section 4; and
- The **Holyfield 9 Fed Com #706H well** (API No. 30-025-47700), and the **Holyfield 9 Fed Com #707H well** (API No. 30-025-

pending), both of which are to be drilled from a common surface hole location in SW/4 SE/4 (Unit O) of said Section 9 to bottom hole locations in the NW/4 NE/4 (Unit B) of said Section 4.

The completed interval for the proposed **Holyfield 9 Fed Com #702H well** will remain within 330 feet of the quarter-quarter line separating the E/2 E/2 from the W/2 E/2 of Sections 4 and 9 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

In **Case No. 21859**, EOG seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S253402N;WOLFCAMP [98116]) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 4 and 9, Township 25 South, Range 34 East, NMPM, Lea County, New Mexico. EOG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The **Holyfield 9 Fed Com #708H well** (API No. 30-025-47701), and the **Holyfield 9 Fed Com #709H well** (API No. 30-025-47702), both of which are to be drilled from a common surface hole location in SE/4 SW/4 (Unit N) of said Section 9 to a bottom hole location in the NE/4 NW/4 (Unit C) of said Section 4; and
- The **Holyfield 9 Fed Com #710H well** (API No. 30-025-47703), and the **Holyfield 9 Fed Com #711H well** (API No. 30-025-47704), both of which are to be drilled from a common surface hole location in SW/4 SW/4 (Unit M) of said Section 9 to a bottom hole location in the NW/4 NW/4 (Unit D) of said Section 4.

The completed interval for the proposed **Holyfield 9 Fed Com #710H well** will remain within 330 feet of the quarter-quarter line separating the E/2 W/2 from the W/2 W/2 of Sections 4 and 9 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Laci Stretcher, Landman	Affidavit	Approx. 6
Terra George, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

If uncontested at the hearing, EOG intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



By: _____

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