

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

**APPLICATION OF SPUR ENERGY  
PARTNERS, LLC FOR COMPULSARY  
POOLING, EDDY COUNTY, NEW MEXICO**

**CASE NO. 21936**

**PRE-HEARING STATEMENT**

Respondent Contango Oil & Gas Company (“Contango”) submits its Pre-Hearing Statement as follows:

**STATEMENT OF THE CASE**

Spur Energy Partners, LLC (“Spur”) has brought this action to compulsory pool non-participating working interest owners, regarding a 320-acre, more or less, spacing and proration unit, comprised of the N/2 of Section 36, Township 17 South, Range 27 East, NMPM, Eddy County, New Mexico and all uncommitted interests in the Yeso formation from the top of the Yeso formation to a depth of approximately 3,500 feet as to the following wells: Waukee A 36 State Com 13H, Waukee A 36 State Com 70H, Waukee B 36 State Com 12H, and Waukee B 36 State Com 52H. Respondent, Contango, is an affected Yeso formation interest owner.

In at least one previous instance, Applicant drilled, hydraulically fractured and completed a horizontal well which caused damage to an existing vertical wellbore owned and operated by Respondent. Respondents have spent approximately \$150,000 repairing and securing said well. Additionally, the damage to Respondent’s well created a serious safety issue which requires additional examination. Finally, Respondent needs additional time to analyze the overall effects on production. It will take additional time together more data regarding subsequent production and related problems.

**APPEARANCES**

RESPONDENT

Contango Oil & Gas Company  
717 Texas Ave #2900  
Houston, TX 77002

RESPONDENT'S ATTORNEY

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**RESPONDENT'S PROPOSED EVIDENCE**

WITNESSES

ESTIMATED TIME

EXHIBITS

Jason Thomas	15 minutes	Approx. 5-10
Wade Wardlow	15 minutes	Approx. 5-10
Neal Hageman, P.E.	15 minutes	Approx. 5-10

**PROCEDURAL MATTERS**

Respondent has filed a Motion for Continuance concurrent herewith.

**RESPONDENT'S POSITION ON RELIEF SOUGHT**

Respondent opposes the issuance of the compulsory pooling relief sought by Spur until such time as it has had adequate opportunity to complete its current investigation and negotiations regarding the effects on its interests made subject to this action.

RESPECTFULLY SUBMITTED,

CAVIN & INGRAM, P.A.

By: 

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ATTORNEYS FOR RESPONDENT  
CONTANGO OIL & GAS COMPANY

I hereby certify that a true and correct copy  
of the foregoing was served via email and  
U.S. mail on May 27, 2021 to the following:

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