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

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE, LLC TO AMEND ORDER NOS. R-21209 & R-21209-A, EDDY COUNTY, NEW MEXICO.

CASE NO. 21974

(formerly Cases 21038, 21741)

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE, LLC TO AMEND ORDER NOS. R-21210 & 21210-A, EDDY COUNTY, NEW MEXICO.

CASE NO. 21975

(formerly Cases 21039, 21742)

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE, LLC TO AMEND ORDER NOS. R-21211 & R-21211-A, EDDY COUNTY, NEW MEXICO.

CASE NO. 21976

(formerly Cases 21040, 21743)

NOVO'S CONSOLIDATED PRE-HEARING STATEMENT

Novo Oil and Gas Northern Delaware, LLC ("Novo") (OGRID No. 372920), submits this

Consolidated Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

Novo Oil & Gas Northern Delaware, LLC Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart LLP Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

APPLICANT'S STATEMENT OF CASE

In Case No. 21974, Novo seeks to amend **Order Nos. R-21209 & R-21209-A** to pool only the interests underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 SW/4 of Section 10, and the W/2 W/2 of Section 15, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico, in the Bone Spring formation (Laguna Salado; Bone Spring pool [96721]) from a depth of 7,839 feet to the base of the Bone Spring formation, under the terms of the Orders. The Orders dedicated the Unit to the proposed the **Saturninus Fed Com 1510** #121H and #131H wells.

In Case No. 21975, Novo seeks to amend **Order Nos. R-21210 & R-21210-A** to pool only the interests underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the E/2 SW/4 of Section 10, and the E/2 W/2 of Section 15, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico, in the Bone Spring formation (Laguna Salado; Bone Spring pool [96721]) from a depth of 7,839 feet to the base of the Bone Spring formation, under the terms of the Orders. The Orders dedicated the Unit to the proposed the **Saturninus Fed Com 1510** #122H and #132H wells.

In Case No. 21976, Novo seeks to amend **Order No. R-21211 & R-21211-A** to pool only the interests underlying a standard 480-acre, more or less, horizontal spacing unit comprised of the SW/4 of Section 10, and the W/2 of Section 15, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico, in the Wolfcamp formation (Purple Sage-Wolfcamp Gas Pool [98220]), under the terms of the Orders. The Orders dedicated the Unit to the proposed **Saturninus Fed Com 1510 #211H, #212H, #215H, #221H, #222H, #225H, #231H, #232H,** and **#235H wells**.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise **ESTIMATED TIME**

EXHIBITS

Brandon Patrick, Landman

Affidavit

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PROCEDURAL MATTERS

If unopposed at the time of hearing, Novo intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

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State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 33690

QUESTIONS

Operator:	OGRID:
NOVO OIL & GAS NORTHERN DELAWARE, LLC	372920
1001 West Wilshire Blvd	Action Number:
Oklahoma City, OK 73116	33690
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witness	1
Testimony time (in minutes)	Not answered.