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

APPLICATION OF SPUR ENERGY PARTNERS, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NOS. 21983 & 21984

SPUR ENERGY PARTNERS, LLC'S CONSOLIDATED PRE-HEARING STATEMENT

Spur Energy Partners, LLC ("Spur") (OGRID No. 328947), the applicant in the above-referenced cases, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

Spur Energy Partners, LLC

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APPLICANT'S STATEMENT OF CASE

In Case No. 21983, Spur seeks an order pooling all uncommitted interests in a portion of the Yeso formation (Red Lake, Glorieta-Yeso (51120)), underlying a standard 160-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Section 26, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico. Spur seeks to dedicate this spacing unit to the proposed initial wells: (1) the Morris-Boyd #9H well, and (2) the Morris-Boyd #10H well, each of

which will be horizontally drilled from a common surface location in the SW/4 SE/4 (Unit O) of Section 23, to bottom hole locations in the SW/4 SE/4 (Unit O) of Section 26. The completed interval of the wells will comply with statewide setbacks for oil wells.

In Case No. 21984, Spur seeks an order pooling all uncommitted interests in a portion of the Yeso formation (Red Lake, Glorieta-Yeso (51120)) underlying a standard 160-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Section 26, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico. Spur seeks to dedicate this spacing unit to these proposed initial wells: (1) the Morris-Boyd #11H well, and (2) the Morris-Boyd #13H well, each of which will be horizontally drilled from a common surface location in the SE/4 SE/4 (Unit P) of Section 23, to bottom hole locations in the SE/4 SE/4 (Unit P) of Section 26. The completed interval for each well will comply with Statewide rules for oil wells.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS	
Megan Peña, Landman	Affidavit	Approx. 4	
C. J. Lipinski, Geologist	Affidavit	Approx. 4	

PROCEDURAL MATTERS

If uncontested at the time of hearing, Spur intends to present these consolidated cases by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

By: _

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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 33663

QUESTIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	33663
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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