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

APPLICATION OF ADVANCE ENERGY PARTNERS HAT MESA, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

**CASE NO. 22106** 

## PRE-HEARING STATEMENT

Advance Energy Partners Hat Mesa, LLC ("Applicant") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

## **APPEARANCES**

#### **APPLICANT**

Advance Energy Partners Hat Mesa, LLC

#### **ATTORNEYS**

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#### **INTERESTED PARTIES**

ConocoPhillips Company

# **ATTORNEYS**

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# **STATEMENT OF THE CASE**

Applicant applies for an order pooling all uncommitted mineral interests in the Wolfcamp formation underlying a 360-acre, more or less, standard horizontal spacing unit comprised of the SE/4 NE/4 and E/2 SE/4 of Section 13, E/2 E/2 of Section 24, and E/2 NE/4 of Section 25, Township 21 South, Range 32 East in Lea County, New Mexico ("Unit"). The Unit will be dedicated to following wells:

- Margarita Fed Com #20H, which will be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 13 in T21S-R32E to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 25 in T21S-R32E; and
- Margarita Fed Com #24H, which will be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 13 in T21S-R32E to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 25 in T21S-R32E ("Wells").

The completed intervals of the Wells will be orthodox. Also to be considered will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately twenty-seven (27) miles west of Eunice, New Mexico.

# PROPOSED EVIDENCE

		Estimated	
Witness	Occupation	Time	<b>Exhibits</b>
Paul Burdick	Land Advisor	Affidavit	Approx. 7
<b>Edward Caamano</b>	Vice President of	Affidavit	Approx. 5
	Geoscience		

## PROCEDURAL MATTERS

Applicant will present its case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

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Counsel for Advance Energy Partners Hat Mesa, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 2, 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Post Office Box 2208 Santa Fe, New Mexico 87504 Attorneys for ConocoPhillips Company

/s/ Dana S. Hardy
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QUESTIONS

Action 46258

#### **QUESTIONS**

Operator:	OGRID:
ADVANCE ENERGY PARTNERS HAT MESA, LLC	372417
11490 Westheimer Rd., Ste 950	Action Number:
Houston, TX 77077	46258
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

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