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

APPLICATION OF SPUR ENERGY PARTNERS, LLC TO AMEND ORDER NO. R-21582, EDDY COUNTY, NEW MEXICO.

**CASE NO. 22467** 

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

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

#### **APPEARANCES**

#### **APPLICANT**

# **ATTORNEY**

Spur Energy Partners, LLC

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

## **APPLICANT'S STATEMENT OF CASE**

Spur seeks to amend Order No. R-21582 (the "Order") to allow for a one year extension for drilling the proposed initial well under the Order. Order No. R-21582, entered on January 19, 2021, in Case No. 21584, created a standard 200-acre horizontal spacing unit in a portion of the Yeso formation, in the Atoka; Glorieta Yeso Pool (3250) from the top of the Pool to a depth of 3,200 feet, underlying the N/2 S/2 of Section 28,

and the NE/4 SE/4 of Section 29, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico (the "Unit"), and designated Applicant as the operator of the Unit. The Unit was designated to the proposed initial (1) the Radiohead #1H well, and (2) the Radiohead #2H well. Order No. R-21582 required the drilling of the initial well by January 19, 2022. Spur requests a one-year extension of time to drill the initial well under the Order, until January 19, 2023.

## APPLICANT'S PROPOSED EVIDENCE

WITNESS ESTIMATED TIME EXHIBITS
Name and Expertise

Rett Dalton, Landman Affidavit Approx. 4

## PROCEDURAL MATTERS

If uncontested at the time of hearing, Spur intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By:\_\_\_\_\_

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Post Office Box 2208 Santa Fe, NM 87504 505-998-4421

505-998-4421 505-983-6043 Facsimile

mfeldewert@hollandhart.com agrankin@hollandhart.com

jbroggi@hollandhart.com kaluck@hollandhart.com

ATTORNEYS FOR SPUR ENERGY PARTNERS, LLC

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 69654

#### **QUESTIONS**

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	69654
	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.