

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

**APPLICATION OF SPC RESOURCES, LLC
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 22554 & 22555

SPC'S CONSOLIDATED PRE-HEARING STATEMENT

SPC Resources, LLC, applicant in the above-referenced cases, submits this consolidated Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

SPC Resources, LLC ("SPC Resources")

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

OTHER PARTIES

Jalapeno Corporation

ATTORNEY

J.E. Gallegos
Michael J. Condon
GALLEGOS LAW FIRM, P.C.
460 St. Michael's Drive, Bldg. 300
Santa Fe, New Mexico 87505
(505) 983-6686

Earthstone Permian LLC and
Earthstone Operating, LLC

Dana S. Hardy
Michael Rodriguez
Jaclyn M. McLean
HINKLE SHANOR LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505) 982-4554
(505) 982-8623 FAX

APPLICANT'S STATEMENT OF CASE

In **Case No. 22554**, SPC seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 1,282.24-acre, more or less, horizontal well spacing unit comprised of Sections 1 and 2 all in Township 22 South, Range 26 East, NMPM, Eddy County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the proposed **Water Buffalo 403H well**, to be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 3, Township 22 South, Range 26 East, to bottom-hole location in the NE/4 SE/4 (Unit I) of Section 1, Township 22 South, Range 26 East.

In **Case No. 22555**, SPC seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 1,908.20-acre, more or less, horizontal well spacing unit comprised of Section 36, Township 21 South, Range 26 East, and irregular Section 31 and Section 32 in Township 21 South, Range 27 East, NMPM, Eddy County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed initial wells: (1) the **Fred 402H well**, and (2) the **Fred 442H well**, both are to be horizontally drilled from a common surface location in the SE/4 NE/4 (Unit H) of said Section 32, Township 21 South, Range 27 East, to bottom-hole locations in the SW/4 NW/4 (Unit E) of Section 36, Township 21 South, Range 27 East.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Gary Waldrop, Land Representative	Affidavit	Approx. 8
John Weihe, Geology	Affidavit	Approx. 6

PROCEDURAL MATTERS

SPC intends to present these consolidated cases by affidavit if uncontested at time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com

ATTORNEYS FOR SPC RESOURCES, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

J.E. Gallegos
Michael J. Condon
GALLEGOS LAW FIRM, P.C.
460 St. Michael's Drive, Bldg. 300
Santa Fe, New Mexico 87505
(505) 983-6686
jeg@gallegoslawnfirm.net
mjc@gallegoslawnfirm.net

Attorneys for Jalapeno Corporation

Dana S. Hardy
Michael Rodriguez
Jaclyn M. McLean
HINKLE SHANOR LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505) 982-4554
(505) 982-8623 FAX
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com
jmclean@hinklelawfirm.com

Attorneys for Earthstone Permian LLC and Earthstone Operating, LLC



Adam G. Rankin

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
District IV
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 94982

QUESTIONS

Operator: SPC RESOURCES, LLC P.O. Box 1020 Artesia, NM 88211	OGRID: 372262
	Action Number: 94982
	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.