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

APPLICATIONS OF REDWOOD OPERATING LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 22627-22628

REDWOOD'S CONSOLIDATED PRE-HEARING STATEMENT

Redwood Operating LLC ("Redwood" or "Applicant") (OGRID No. 330211) submits this consolidated Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In Case No. 22627, Redwood seeks an order (1) order pooling all uncommitted interests in a 200-acre, more or less, horizontal well spacing unit in a portion of the Yeso formation from

the top of the Yeso formation to a depth of 3,000 feet comprised of the SW/4 NW/4 of Section 18, Township 18 South, Range 27 East, and the S/2 N/2 of Section 13, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the proposed initial **Kaiser 18 #1H well**, to be horizontally drilled from a surface location in the SE/4 NW/4 (Unit F) of said Section 18 to a bottom hole location in the SW/4 NW/4 (Unit E) of said Section 13. The completed interval of the well will comply with statewide setbacks for oil wells.

In Case No. 22628, Redwood seeks an order (1) pooling all uncommitted interests in a 200-acre, more or less, horizontal well spacing unit in a portion of the Yeso formation from a depth of 3,000 feet to the base of the Yeso formation, comprised of the SW/4 NW/4 of Section 18, Township 18 South, Range 27 East, and the S/2 N/2 of Section 13, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the proposed initial Kaiser 18 #4H well, to be horizontally drilled from a surface location in the SE/4 NW/4 (Unit F) of said Section 18 to a bottom hole location in the SW/4 NW/4 (Unit E) of said Section 13. The completed interval of the wells will comply with statewide setbacks for oil wells.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS	
Derik Smith – Landman	Via Affidavit	Approx. 5	
Matthew Brewer – Geologist	Via Affidavit	Approx. 4	

PROCEDURAL MATTERS

If unopposed, Redwood intends to present these cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By:

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ATTORNEYS FOR REDWOOD OPERATING 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:

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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 95024

QUESTIONS

Operator:		OGRID:
R	ledwood Operating LLC	330211
P	O Box 1370	Action Number:
Α	rtesia, NM 88210	95024
		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.	