

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

**APPLICATION OF CIMAREX ENERGY CO.,
FOR A HORIZONTAL SPACING UNIT AND
COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO**

Case No. 22894

PREHEARING STATEMENT

Cimarex Energy Co. (“Cimarex”), OGRID No. 215099, through its undersigned attorneys, submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division (“Division”).

APPEARANCES

APPLICANT

Cimarex Energy Co.

ATTORNEY

Darin C. Savage
William E. Zimsky
Luke Kittinger
Andrew D. Schill
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
bill@abadieschill.com
luke@abadieschill.com
andrew@abadieschill.com

APPLICANT’S STATEMENT OF CASE

In Case No. 22894, Cimarex seeks an order (1) establishing a standard 640-acre, more or less, spacing and proration unit comprised of the E/2 of Sections 12 and 13, Township 25 South, Range 28 East, NMPM, Eddy County, New Mexico, and (2) pooling all uncommitted mineral

interests in the Wolfcamp formation, designated as a gas pool, underlying said unit. Cimarex dedicates the proposed spacing and proration unit (“HSU”) to its **Riverbend 12-13 Federal Com 1H Well, Riverbend 12-13 Federal Com 2H Well, Riverbend 12-13 Federal Com 19H Well and Riverbend 12-13 Federal Com 20H Well**, as initial wells. The **Riverbend 12-13 Federal Com 1H Well**, a gas well, is to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 1 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 13. The **Riverbend 12-13 Federal Com 2H Well**, a gas well, is to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 1 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 13. The **Riverbend 12-13 Federal Com 19H Well**, a gas well, is to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 1 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 13. Finally, the **Riverbend 12-13 Federal Com 20H Well**, a gas well, is to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 1 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 13.

Cimarex has sought in good faith, but has been unable to obtain, voluntary agreement from all interest owners to participate in the drilling of the wells or in the commitment of their interests to the wells for development within the proposed HSU. The pooling of all interests in the Wolfcamp formation within the proposed HSU, and establishing the spacing unit, will avoid the drilling of unnecessary wells, prevent waste and protect correlative rights.

The proposed wells, which will be located in the Purple Sage; Wolfcamp Pool (Code 98220), are unorthodox in their locations, as the take points, at 100’ from the boundaries of the HSU extend into the setback requirements of the Special Rules for the Purple Sage Wolfcamp Pool (Order No. R-14262). Accordingly, Cimarex will apply administratively for approval of nonstandard locations (NSLs).

APPLICANT’S PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Riley Morris	Approx. 10 min	Approx. 5
Geologist: Meera Ramoutar	Approx. 10 min	Approx. 6

PROCEDURAL MATTERS

No protests or objections have been filed and Cimarex does not anticipate any at this time; consequently, Cimarex plans to conduct the hearing by affidavit.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ Darin C. Savage

Darin C. Savage

William E. Zimsky
Luke Kittinger
Andrew D. Schill
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
bill@abadieschill.com
luke@abadieschill.com
andrew@abadieschill.com

Attorneys for Cimarex Energy Co.

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 121906

QUESTIONS

Operator: CIMAREX ENERGY CO. 600 N. Marienfeld Street Midland, TX 79701	OGRID: 215099
	Action Number: 121906
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	2
Testimony time (in minutes)	20