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

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 22957

NOVO OIL & GAS NORTHERN DELAWARE, LLC'S PRE-HEARING STATEMENT

Novo Oil & Gas Northern Delaware, LLC ("Applicant") (OGRID No. 372920) submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

<u>APPLICANT</u>

ATTORNEY

Novo Oil & Gas Northern Delaware, LLC

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APPLICANT'S STATEMENT OF CASE

Applicant seeks an order pooling all uncommitted interest in the Wolfcamp formation underlying a standard 318.34-acre, more or less, horizontal well spacing unit comprised of the S/2 of Section 7, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico.

Applicant proposes to dedicate the above-referenced spacing unit to the following initial well:

Turks Fee 07 211H well, to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of adjacent Section 18 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 7. Applicant has sought and been unable to obtain voluntary agreement for the

development of these lands from all working interest owners in the subject spacing unit. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Patrick – Landman	By Affidavit	Approx. 5
Michael Hale – Geologist	By Affidavit	Approx. 4

PROCEDURAL MATTERS

Applicant anticipates presenting this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By:

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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 129579

QUESTIONS

Operator:	OGRID:
NOVO OIL & GAS NORTHERN DELAWARE, LLC	372920
1001 West Wilshire Blvd	Action Number:
Oklahoma City, OK 73116	129579
	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.	