

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

**APPLICATIONS OF BTA OIL PRODUCERS,
LLC FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

CASE NOS. 23664, 23665

CONSOLIDATED PRE-HEARING STATEMENT

BTA Oil Producers, LLC (“BTA” or “Applicant”) submits its Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

BTA Oil Producers, LLC

ATTORNEYS

Dana S. Hardy
Jaclyn McLean
Yarithza Peña
Hinkle Shanor LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505) 982-4554
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com
ypena@hinklelawfirm.com

INTERESTED PARTIES

Greyhound Resources Company

ATTORNEYS

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
HOLLAND & HART, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
TEL: (505) 988-4421
FAX: (505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

STATEMENT OF THE CASE

In **Case No. 23664**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 W/2 of Sections 27 and 22, Township 16 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 27-22 State Com #19H** well, to be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 27 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 22.

In **Case No. 23665**, BTA applies for an order pooling all uncommitted interests in the Pennsylvanian Shale formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 W/2 of Sections 27 and 22, Township 16 South, Range 36 East, Lea County, New Mexico. The spacing unit will be dedicated to the **Capitan 22301 27-22 State Com #20H** well, to be drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 27 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 22.

The completed intervals of the wells will be orthodox. Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as the operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

The Capitan 22301 27-22 State Com #19H and #20H wells are located approximately 3 miles south of Lovington, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Adams Davenport	Landman	Affidavit	Approx. 5
David Childers	Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Applicant will present these matters by affidavit if there is no opposition. Applicant requests that the above-referenced matters be consolidated for hearing.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn McLean

Yarithza Peña

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

ypena@hinklelawfirm.com

Counsel for BTA Oil Producers, LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2023, I caused a true and correct copy of the foregoing document to be emailed to:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
HOLLAND & HART, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
TEL: (505) 988-4421
FAX: (505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com
Attorneys for Greyhound Resources Company

/s/ Dana S. Hardy
Dana S. Hardy

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 245027

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 245027
	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.