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

APPLICATION OF SPUR ENERGY PARTNERS LLC TO AMEND ORDER R-22222, AS AMENDED, TO ADD ADDITIONAL POOLED PARTIES, EDDY COUNTY, NEW MEXICO.

CASE NO. 23903 (formerly Case Nos. 21587, 21583, and 22767)

SPUR ENERGY PARTNERS LLC'S PRE-HEARING STATEMENT

Spur Energy Partners LLC ("Spur" or "Applicant"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

Spur Energy Partners LLC ("Spur")

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APPLICANT'S STATEMENT OF THE CASE

In Case No. 23903, Spur seeks an order to amend pooling Order R-22222 ("Pooling Order"), as amended, to add an additional working interest owner to the Pooling Order. Division Order No. R-22222, entered on August 29, 2022, in Case Nos. 21587, 21583 and 22767, replaced and revoked Order R-21580 and Order R-21583, and pooled the uncommitted interests in the Yeso formation (Red Lake; Glorieta-Yeso [51120]), from 3,001 feet to the base of the Yeso formation

underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 18, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Spur is the designated operator under the Pooling Order and the pooled spacing unit is initially dedicated to the proposed **Baffin #10H** (API No. 30-015-PENDING), **Baffin #11H** (API No. 30-015-PENDING), **Baffin #70H** (API No. 30-015-PENDING) and **Baffin #71H** (API No. 30-015-PENDING). Order R-22222-A extended the period to drill under Order R-22222 until August 29, 2024. Spur has discovered an additional working interest owner it seeks to pool that was not subject to the pooling proceedings giving rise to Order R-22222, as amended.

APPLICANT'S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|----------------------------|-------------------------|-----------|
| Drew Oldis, Landman | Self-Affirmed Statement | Approx. 3 |

PROCEDURAL MATTERS

Spur intends to present this case by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By:

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QUESTIONS

Action 279563

QUESTIONS

| Operator: | OGRID: |
|--------------------------|--|
| Spur Energy Partners LLC | 328947 |
| 9655 Katy Freeway | Action Number: |
| Houston, TX 77024 | 279563 |
| | 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. | |