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

APPLICATION OF SPUR ENERGY PARTNERS LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

**CASE NO. 24065** 

#### PRE-HEARING STATEMENT

Spur Energy Partners, LLC ("Spur" or "Applicant") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT ATTORNEYS

Spur Energy Partners, LLC Dana S. Hardy

Jackyn McLean

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INTERESTED PARTY ATTORNEYS

None.

### **STATEMENT OF THE CASE**

Spur seeks an order pooling all uncommitted interests in the Yeso formation underlying a 200-acre, more or less, standard horizontal spacing unit comprised of the NE/4 SE/4 of Section 29 and the N/2 S/2 of Section 28, Township 18 South, Range 26 East, Eddy County, New Mexico ("Unit"). Applicant seeks to dedicate the Unit to the **Radiohead 29-28 Fee 10H** and **Radiohead 29-28 Fee 60H** wells ("Wells"), which will be drilled from surface hole locations in the NW/4 SE/4 (Unit J) of Section 29 to bottom hole locations in the NE/4 SE/4 (Unit I) of Section 28. 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 Wells are located approximately 8.69 miles south and .10 miles west of Artesia, NM.

## **PROPOSED EVIDENCE**

| Witness         | Occupation | <b>Estimated Time</b> | Exhibits  |
|-----------------|------------|-----------------------|-----------|
| Scott Hartman   | Senior     | Affidavit             | Approx. 5 |
|                 | Landman    |                       |           |
| Matthew Van Wie | Geologist  | Affidavit             | Approx. 4 |

# **PROCEDURAL MATTERS**

Applicant will present this matter by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

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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 297983

#### **QUESTIONS**

| Operator:                | OGRID:                                   |
|--------------------------|--|
| Spur Energy Partners LLC | 328947                                   |
| 9655 Katy Freeway        | Action Number:                           |
| Houston, TX 77024        | 297983                                   |
|                          | 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. |  |  |