

**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. 25411  
25412**

**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**

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**INTERESTED PARTY**

Avant Operating II, LLC

**ATTORNEYS**

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### **STATEMENT OF THE CASES**

In **Case No. 25411**, BTA applies for an order pooling all uncommitted interests in the Second Bone Spring interval of the Bone Spring formation underlying a 400-acre, more or less, standard horizontal spacing unit comprised of the W/2 NW/4 of Section 25 and the W/2 W/2 of Sections 24 and 13, Township 20 South, Range 35 East, Lea County, New Mexico. The Unit will be dedicated to the Sage Brush 22302 25-24-13 State Com #3H well, which will be drilled from a surface hole location in the SW/4 NW/4 (Unit E) of Section 25 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 13.

In **Case No. 25412**, BTA applies for an order pooling all uncommitted interests in the Second Bone Spring interval of the Bone Spring formation underlying a 400-acre, more or less, standard horizontal spacing unit comprised of the E/2 NW/4 of Section 25 and the E/2 W/2 of Sections 24 and 13, Township 20 South, Range 35 East, Lea County, New Mexico. The Unit will be dedicated to the Sage Brush 22302 25-24-13 State Com #4 well, which will be drilled from a surface hole location in the NE/4 NW/4 (Unit C) of Section 13.

A depth severance exists within the Units. Therefore, BTA seeks to pool only those uncommitted interests from the top of the Second Bone Spring interval, at a stratigraphic equivalent of approximately 9,538' TVD, to the top of the Third Bone Spring interval, at a stratigraphic equivalent of approximately 10,402' TVD, as found in the RSC Resources LP-Heller Co Trust Com "A" 1 well (API No. 30-025-28193).

The completed intervals of the Sage Brush 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 operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

**PROPOSED EVIDENCE**

<b>Witness</b>	<b>Occupation</b>	<b>Estimated Time</b>	<b>Exhibits</b>
Kristeen Ramos	Landman	Affidavit	Approx. 6
Darin Dolezal	Geologist	Affidavit	Approx. 5

**PROCEDURAL MATTERS**

Applicant intends to consolidate these cases for hearing and will present the cases by affidavit if there is no opposition to its applications.

Respectfully submitted,

HARDY McLEAN LLC

/s/ Dana S. Hardy

Dana S. Hardy

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*Counsel for BTA Oil Producers, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of July 2025, I caused a true and correct copy of the foregoing *Consolidated Pre-Hearing Statement* to be sent to the following counsel of record:

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State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
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QUESTIONS

Action 480945

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 480945
	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.