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

ATTORNEYS

BTA Oil Producers, LLC

Dana S. Hardy Jaclyn M. McLean Daniel B. Goldberg Hardy McLean LLC 125 Lincoln Ave, Ste. 223 Santa Fe, NM 87501 Phone: (505) 230-4410 dhardy@hardymclean.com jmclean@hardymclean.com

INTERESTED PARTY

Avant Operating II, LLC

ATTORNEYS

Earl E. DeBrine, Jr. Deana M. Bennett Yarithza Pena Modrall, Sperling, Roehl, Harris & Sisk, P.A. Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, NM 87102-2168 Phone: (505) 848-1800 yarithza.pena@modrall.com deana.bennett@modrall.com earl.debrine@modrall.com

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

Witness	Occupation	Estimated Time	Exhibits
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 Jaclyn M. McLean Daniel B. Goldberg 125 Lincoln Ave, Ste. 223 Santa Fe, NM 87501 Phone: (505) 230-4410 dhardy@hardymclean.com jmclean@hardymclean.com dgoldberg@hardymclean.com *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:

Earl E. DeBrine, Jr. Deana M. Bennett Yarithza Pena Modrall, Sperling, Roehl, Harris & Sisk, P.A. Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, NM 87102-2168 Phone: (505) 848-1800 yarithza.pena@modrall.com deana.bennett@modrall.com earl.debrine@modrall.com

> /s/ Dana S. Hardy 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

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Action 480949

QUESTIONS				
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Operator:	OGRID:
BTA OIL PRODUCERS, LLC	260297
104 S Pecos	Action Number:
Midland, TX 79701	480949
	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.			