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

## APPLICATION OF FAE II OPERATING, LLC TO EXTEND THE VERTICAL LIMITS OF THE RHODES; YATES-SEVEN RIVERS POOL WITHIN THE SOUTH JAL UNIT, LEA COUNTY, NEW MEXICO.

CASE NO. 25426

## PRE-HEARING STATEMENT

FAE II Operating, LLC ("Applicant") submits its Pre-Hearing Statement pursuant to the

rules of the Oil Conservation Division.

## APPLICANT

FAE II Operating, LLC

## ATTORNEYS

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**

## ATTORNEYS

None.

## **STATEMENT OF THE CASE**

Applicant seeks an order extending the vertical limits of the Rhodes; Yates-Seven Rivers Pool (Pool Code 52250) to include the Queen formation only within the boundaries of the South Jal Unit. Order No. R-23736 approved the South Jal (Yates-Seven Rivers-Queen) Unit ("Unit") for enhanced oil recovery operations in the Yates, Seven Rivers, and Queen formations and designated Applicant as operator of the Unit. The Unit encompasses approximately 19,359.77 acres of the following federal, state, and fee lands located in Lea County, New Mexico:

### Township 25 South, Range 36 East

Section 13: SE/4 Section 24: E/2 Section 25: All Section 26: E/2 E/2 Section 36: N/2, SE/4

### Township 25 South, Range 37 East

Section 15: W/2 W/2 Section 16: All Section 18: Lot 4 Section 19: All Section 21: Lot 1 through Lot 4 (inclusive), E/2 SW/4 Section 22: W/2 NW/4, S/2 Section 23: SW/4 Section 26: W/2, SW/4 SE/4 Section 27: All Section 28: All Section 30: Lot 1 through Lot 4 (inclusive), E/2 W/2, W/2 E/2 Section 31: All Section 32: All Section 33: All Section 34: All Section 35: NW/4, W/2 NE/4, S/2

### Township 26 South, Range 37 East

Section 3: All Section 4: All Section 5: All Section 6: All Section 7: All Section 8: All Section 9: All Section 10: All Section 15: All Section 16: All Section 17: All Section 18: Lot 1, NE/4 NW/4, E/2 Section 19: NE/4 Section 20: All Section 21: W/2, NE/4, W/2 SE/4 Section 22: N/2 Section 23: SW/4 NW/4 Section 29: All Section 32: N/2 N/2, Lots 1 through 4 (inclusive)

## Township 25 South, Range 37 East Section 32: All

The Unitized Interval includes the Jalmat; Tan-Yates-Seven Rivers (Oil) Pool (Pool Code 33820), the Langlie-Mattix; Seven Rivers-Queen-Grayburg Pool (Pool Code 37240), and the Yates, Seven Rivers, and Queen formations. The Rhodes; Yates-Seven Rivers Pool (Pool Code 52250) is also within the Unitized Interval. In order to allow for the most efficient well development pattern, to effectively drain the reserves in the unitized formation underlying the Unit Area, and to maximize administrative reporting and efficiency, Applicant proposes to expand the vertical limit of the Rhodes; Yates-Seven Rivers Pool (Pool Code 52250) to include the Queen formation within the boundaries of the Unit Area.

## PROPOSED EVIDENCE

Witness	Occupation	<b>Estimated Time</b>	Exhibits
Joseph Kent	Landman	Affidavit	Approx. 3
Charles Hooper	Geologist	Affidavit	Approx. 2

## **PROCEDURAL MATTERS**

Applicant intends to present the case by affidavit if there is no opposition to its application.

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 FAE II Operating, LLC Sante Fe Main Office Phone: (505) 476-3441

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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 480959

QUESTIONS				
Operator:	OGRID:			
FAE II Operating LLC	329326			
11757 Katy Freeway, Suite 725	Action Number:			
Houston, TX 77079	480959			
	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.	