

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

**APPLICATION OF ALPHA ENERGY  
PARTNERS II, LLC, FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO**

**Case No. 25498**

**PREHEARING STATEMENT**

Alpha Energy Partners II, LLC, as Applicant (“Alpha” or “Applicant”), through its undersigned attorneys, submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division (“Division”).

**APPLICANT**

Alpha Energy Partners II, LLC

**ATTORNEY**

Darin C. Savage  
Andrew D. Schill  
William E. Zimsky  
214 McKenzie Street  
Santa Fe, New Mexico 87501  
Telephone: 970.385.4401  
Facsimile: 970.385.4901  
darin@abadieschill.com  
andrew@abadieschill.com  
bill@abadieschill.com

**INTERESTED PARTIES**

City of Carlsbad

Deana Bennett  
Earl E. DeBrine  
Yarithza Pena  
Modrall Sperling  
500 4<sup>th</sup> Street NW  
Suite 1000  
Albuquerque, NM 87102  
Telephone: 505.848.1800  
Facsimile: 505.848.9710  
Deana.bennett@modrall.com  
Earl.DeBrine@modrall.com  
Yarithza.Pena@modrall.com

ConocoPhillips Company

Elizabeth Ryan  
Keri L. Hatley  
ConocoPhillips  
1048 Paseo de Peralta  
Santa Fe, New Mexico 87501  
Telephone: 505.780.8000  
beth.ryan@conocophillips.com  
keri.hatley@conocophillips.com

### **APPLICANT'S STATEMENT OF THE CASE**

In Case No. 25498, Alpha seeks an order pooling all uncommitted mineral interests in the Bone Spring formation, designated as an oil pool, underlying a standard 317.08-acre, more or less, horizontal spacing unit comprised of the S/2 S/2 of Sections 17 and 18 in Township 22 South, Range 27 East, Eddy County, New Mexico. Alpha proposes and dedicates to the HSU the **Hollywood Star 17-18 Fee 501H Well** and the **Hollywood Star 17-18 Fee 551H Well**, as the initial wells, to be drilled to a sufficient depth to test the Bone Spring. Alpha designates Paloma Permian AssetCo, OGRID No. 332449, as its designated operator for the unit and wells.

Alpha proposes the **Hollywood Star 17-18 Fee 501H Well**, an oil well, to be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 16 to a bottom hole location in Lot 4 (SW/4 SW/4) of Section 18.

Alpha proposes the **Hollywood Star 17-18 Fee 551H Well**, an oil well, to be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 16 to a bottom hole location in Lot 4 (SW/4 SW/4) of Section 18.

The wells proposed herein are orthodox in their location, and the take points and completed intervals comply with setback requirements under statewide rules.

**APPLICANT'S PROPOSED EVIDENCE**

| WITNESS                  | ESTIMATED TIME | EXHIBITS   |
|--------------------------|----------------|------------|
| Landman: John Coffman    | Approx. 10 min | Approx. 5  |
| Geologist: Jason McClain | Approx. 10 min | Approx. 10 |

**PROCEDURAL MATTERS**

Since the unit in this Case No. 25498 is within the same sections as the units proposed by Alpha in Case Nos. 25495 – 25497, Alpha requests that the cases be consolidated. No protests or objections have been filed and Devon does not anticipate any at this time; consequently, Alpha plans to conduct the hearing by affidavit.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ Darin C. Savage  
Darin C. Savage

Andrew D. Schill  
William E. Zimsky  
214 McKenzie Street  
Santa Fe, New Mexico 87501  
Telephone: 970.385.4401  
Facsimile: 970.385.4901  
darin@abadieschill.com  
andrew@abadieschill.com  
bill@abadieschill.com

***Attorneys for Alpha Energy Partners II, LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed with the New Mexico Oil Conservation Division and was served on counsel of record, via electronic mail on July 31, 2025:

Elizabeth Ryan – beth.ryan@conocophillips.com  
Keri L. Hatley – keri.hatley@conocophillips.com  
***Attorneys for ConocoPhillips Company***

Deana Bennett - Deana.bennett@modrall.com  
Earl DeBrine - Earl.DeBrine@modrall.com  
Yarithza Peña - Yarithza.Pena@modrall.com  
***Attorneys for the City of Carlsbad***

/s/ Darin C. Savage  
Darin C. Savage

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

QUESTIONS

Action 491069

QUESTIONS

|                                                                          |                                                          |
|--------------------------------------------------------------------------|----------------------------------------------------------|
| Operator:<br>AEP II Operating LLC<br>P.O. Box 10701<br>Midland, TX 79702 | OGRID:<br>332909                                         |
|                                                                          | Action Number:<br>491069                                 |
|                                                                          | Action Type:<br>[HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

|                                                                             |    |
|-----------------------------------------------------------------------------|----|
| Testimony                                                                   |    |
| Please assist us by provide the following information about your testimony. |    |
| Number of witnesses                                                         | 2  |
| Testimony time (in minutes)                                                 | 20 |