# 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. 25532** 

# **PRE-HEARING STATEMENT**

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

APPLICANT ATTORNEYS

Spur Energy Partners LLC

Dana S. Hardy

Jaclyn M. McLean

Levis B. Karnenke

Jamie R. Kennedy Hardy McLean LLC 125 Lincoln Ave, Ste. 223 Santa Fe, NM 87501 Phone: (505) 230-4410 dhardy@hardymclean.com

jmclean@hardymclean.com jkennedy@hardymclean.com

INTERESTED PARTY ATTORNEYS

None.

# STATEMENT OF THE CASE

Applicant seeks an order pooling all uncommitted interests from top of the Yeso Formation to approximately 5,000' TVD underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the S/2 of Section 3, Township 19 South, Range 25 East, Eddy County, New Mexico ("Unit"). The Unit will be dedicated to the following wells ("Wells"): Friesian 3 Federal Com 11H, and Friesian 3 Federal Com 71H, which will be drilled from surface hole locations in the NW/4 SW/4 (Unit L) of Section 2 to bottom hole locations in

the NW/4 SW/4 (Unit L) of Section 3; and Friesian 3 Federal Com 10H and Friesian 3 Federal Com 70H, which will be drilled from surface hole locations in the SW/4 SW/4 (Unit M) of Section 2 to bottom hole locations in the SW/4 SW/4 (Unit M) of Section 3. The completed intervals of the Wells will be orthodox.

The completed interval of the **Friesian 3 Federal Com 1H** well will be located within 330' of the quarter-quarter section line separating the N/2 S/2 and S/2 S/2 of Section 3 to allow for the creation of a 320-acre standard, horizontal spacing unit.

Applicant seeks only to pool those uncommitted interests from the top of the Yeso formation at a stratigraphic equivalent of 2,192' as observed on the Ottawa "AOW" Federal #2 [30-015-28753] Schlumberger Compensated Neutron/Litho-Density Log to 5,000' TVD. Also to be considered will be the cost of drilling and completing the Wells, the allocation of the costs, the designation of Applicant as operator of the Wells and the Unit, and a 200% charge for the risk involved in drilling and completing the Wells.

## PROPOSED EVIDENCE

Witness	Occupation	<b>Estimated Time</b>	<b>Exhibits</b>
Markus Wesner	Landman	Affidavit	Approx. 5
Matthew Van Wie	Geologist	Affidavit	Approx. 4

# **PROCEDURAL MATTERS**

Applicant intends to present this 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
Jamie R. Kennedy
125 Lincoln Ave, Ste. 223
Santa Fe, NM 87501
Phone: (505) 230-4410
dhardy@hardymclean.com
jmclean@hardymclean.com
jkennedy@hardymclean.com

Counsel for Spur Energy Partners LLC

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

General Information Phone: (505) 629-6116

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

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

QUESTIONS

Action 511737

## QUESTIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	511737
	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.	