

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

**APPLICATION OF LIME ROCK
RESOURCES A, L. P. FOR LEASE
COMMINGLING, EDDY COUNTY,
NEW MEXICO.**

Case No. 14701

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PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Lime Rock Resources A, L.P. by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:

Lime Rock Resources A, L.P.

Charles Reagan
1111 Bagby St., Suite 4600
Houston, TX 77002
713-292-9510

ATTORNEY:

Ernest L. Padilla
Padilla Law Firm, P.A.
P.O. Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577

OPPOSITION OR OTHER PARTY:

(Unknown)

STATEMENT OF CASE

APPLICANT: Applicant seeks an exception to Rule 19.15.5.303A NMAC to authorize the surface commingling of production from the Empire Glorieta Yeso Pool originating from its wells located on State of New Mexico Oil and Gas Leases B-6251, B-5862, and LG-6340 collectively comprise the S/2SW/4, NE/4SW/4, SE/4 of Section 24, Township 17, South, Range 28 East, N.M.P.M. Applicant also seeks an exception to the metering requirements of Rule 19.15.5.303B(4)(a) NMAC to authorize the allocation of production from these diversely-owned wells on the basis of periodic well tests. All production from these wells is to be stored at the AID 24 State No.7-9 and AID 24 State Tank Batteries, located in the S/2SW/4, NE/4SW/4, SE/4 of Section 24, Township 17, South, Range 28 East, N.M.P.M.

OPPOSITION OR OTHER PARTY:

(Unknown)

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Charles Reagan, Landman	20 minutes	(1) Land Plat (2) List of Ownership
Mike Phippen, Engineer	30 minutes	(3) Commingling Schematic and Gathering System (4) Type Logs or Cross-Section (5) Downhole Wellbore diagrams (6) Pressure data (7) Affidavit of Service with exhibits
Ernest L. Padilla		

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
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(Unknown)

PROCEDURAL MATTERS

Applicant will move to delete the NW/4SW/4 of Section 24 from the scope of the application.

PADILLA LAW FIRM, P.A.

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