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

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 16344

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 16345

NOVO'S PRE-HEARING STATEMENT

Novo Oil & Gas Northern Delaware, LLC ("Novo"), a wholly owned subsidiary of Novo Oil & Gas, LLC, submits this Pre-Hearing Statement for the above referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT:

Novo Oil & Gas Northern Delaware,

LLC

ATTORNEY

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OPPONENTS:

Matador Production Company

ATTORNEY

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STATEMENT OF CASES

In Case No. 16344 Novo seeks an order pooling all uncommitted mineral interests in the W/2W/2 of Section 9, Township 23 South, Range 28 East, Eddy County, New Mexico in the Bone Spring formation underlying this acreage. This 160.00 acre, more or less, standard horizontal spacing and proration unit is to be dedicated to the applicant's Goonch Fed Com 9 23S 28E 2B 1H well which will be horizontally drilled in the 2nd Bone Spring from a surface location and first take-point location in the SW/4SW/4 of Section 9, Township 23 South, Range 28 East, to a bottom hole location in the NW/4NW/4 of Section 9, Township 23 South, Range 28 East.

In Case No. 16345 Novo seeks an order pooling all uncommitted mineral interests in the Wolfcamp formation underlying the W/2 of Section 9, Township 23 South, Range 28 East, Eddy County, New Mexico. This 320.00 acre, more or less, standard horizontal spacing and proration unit is to be dedicated to the applicant's two proposed initial wells: (1) the Goonch Fed Com 9 23S 28E WXY 1H well which will be horizontally drilled to test the Wolfcamp XY formation from a surface location and first take-point in the SW/4SW/4 of Section 9, Township 23 South, Range 28 East, to a bottom hole location in the NW/4NW/4 of Section 9, Township 23 South, Range 28 East; and (2) the Goonch Fed Com 9 23S 28E WB 1H well which will be horizontally drilled to test the Wolfcamp B formation from a surface location and first take-point in the SW/4SW/4 of Section 9, Township 23 South, Range 28 East, to a bottom hole location in the NW/4NW/4 of Section 9, Township 23 South, Range 29 East.

The completed intervals for all of the proposed wells will be orthodox.

PROPOSED EVIDENCE

Novo Oil & Gas Northern Delaware, LLC

WITNESS	ESTIMATED TIME	EXHIBITS
Brandon Patrick Land	Approx. 15 minutes	8
Justin Christofferson Geologist	Approx. 10 minutes	3
Zach Everman Reservoir Engineer	Approx. 10 minutes	1
Kurt Shipley	Approx. 15 minutes	2

PROCEDURAL MATTERS

The lands and target formations in Novo's Case Nos. 16344 and 16345 are competing applications with the application filed by Matador Production Company in Case No. 16231, and we ask that all three cases be consolidated for hearing.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:

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ATTORNEYS FOR NOVO OIL & GAS NORTHERN DELAWARE, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on July 25, 2018.

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