

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

**AMENDED APPLICATION OF PERCUSSION
PETROLEUM OPERATING, LLC FOR
COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

CASE NO. 20370

**AMENDED APPLICATION OF PERCUSSION
PETROLEUM OPERATING, LLC FOR
COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

CASE NO. 20372

**PERCUSSION PETROLEUM OPERATING, LLC'S
CONSOLIDATED PRE-HEARING STATEMENT**

Percussion Petroleum Operating, LLC ("Percussion") (OGRID No. 371755), the applicant in the above-referenced matters, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Percussion Petroleum Operating, LLC

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com

APPLICANT'S STATEMENT OF CASE

In **Case No. 20370**, Percussion seeks an order pooling all uncommitted interests in the Atoka; Glorieta Yeso Pool (3250) from a depth of 3,201 feet to the base of the Pool in the 200-acre horizontal spacing comprised of the N/2 S/2 of Section 28 and the NE/4 SE/4 of Section 29, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico. Percussion proposes to dedicate the above-referenced spacing unit to the following two wells: (1) the **Radiohead 3H Well**, to be drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 27 to a standard bottom-hole location in the NE/4 SE/4 (Unit I) of Section 29; and (2) the **Radiohead 4H Well**, to be drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 27 to a standard bottom-hole location in the NE/4 SE/4 (Unit I) of Section 29. The completed interval for each well is at an orthodox well location pursuant to the statewide rules for oil wells.

A depth severance exists in the Yeso formation within the proposed the horizontal spacing unit. Accordingly, Percussion seeks to pool only a portion of the Atoka; Glorieta Yeso Pool from 3,201 feet to the bottom of the Yeso formation, at a stratigraphic equivalent of 4,460 feet measured depth, as defined in the Gamma Ray-Neutron Log of the Len Mayer 1 Well (API No. 30-015-05926).

In **Case No. 20372**, Percussion seeks an order pooling all uncommitted interests in the Atoka; Glorieta Yeso Pool (3250) from a depth of 3,001 feet to the base of the Pool within a proposed 160-acre horizontal spacing unit comprised of the S/2 N/2 of Section 28, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico. Percussion proposes to dedicate the above-referenced spacing unit to the following two wells: (1) the **Weezer No. 3H Well**, to be horizontally drilled from a surface location in the be SW/4 NW/4 (Unit E) of Section 27 to a standard bottom-hole location in the SW/4 NW/4 (Unit E) of Section 28; and (2) the **Weezer No. 4H Well**, to be horizontally drilled from a surface location in the SW/4 NW/4 (Unit E) of Section

27 to a standard bottom-hole location in the SW/4 NW/4 (Unit E) of Section 28. The completed interval for each well is at an orthodox well location pursuant to the statewide rules for oil wells.

A depth severance exists in the Yeso formation within the proposed the horizontal spacing unit. Accordingly, Percussion seeks to pool only a portion of the Atoka; Glorieta Yeso Pool from 3,001 feet to the bottom of the Yeso formation, at a stratigraphic equivalent of 4,460 feet measured depth, as defined in the Gamma Ray-Neutron Log of the Len Mayer 1 Well (API No. 30-015-05926).

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Joe Dichiaro, Landman	Approx. 10	Approx. 5
CJ Lipinski, Geologist	Approx. 10	Approx. 4

PROCEDURAL MATTERS

If uncontested, these consolidated cases will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

agrarkin@hollandhart.com

jbroggi@hollandhart.com

**ATTORNEYS FOR PERCUSSION PETROLEUM
OPERATING, LLC**