

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**

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## 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**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Joe Dichiara, 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,

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