

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

**APPLICATION OF LIME ROCK RESOURCES II-A, L.P.
FOR COMPULSORY POOLING, EDDY COUNTY
NEW MEXICO.**

Case No. 20319

PREHEARING STATEMENT

This Pre-hearing Statement is submitted by Ann Landrith Holdings, LLC 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:

ATTORNEY:

Gary Larson
Hinkle Shanor LLP
218 Montezuma Ave.
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OPPOSITION OR OTHER PARTY:

Ann Landrith Holdings, LLC

ATTORNEY:

Ernest L. Padilla
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STATEMENT OF CASE

APPLICANT:

OPPOSITION OR OTHER PARTY:

Ann Landrith Holdings, LLC contends that all or a portion of the proposed spacing and proration unit and applicable depths are not subject to a pooling clause under an oil and gas lease held by the applicant. Ann Landrith LCC further contents that the applicant has not negotiated in

good faith to conform the underlying royalty to current horizontal drilling standards and existing market conditions.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
<u>OPPOSITION</u>		

Landman expert to be named

WITNESSES	EST. TIME	EXHIBITS
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None.

PROCEDURAL MATTERS

Although this case was submitted by affidavit, Ann Landrith Holdings LLC should be allowed to present evidence of current royalty rates and requests further continuance to the Division’s May 30 docket.

Respectfully submitted:

PADILLA LAW FIRM, P.A.

/s/ ERNEST L. PADILLA
ERNEST L. PADILLA
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading was electronically mailed to the following:

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on this 9th day of May, 2019.

/s/ ERNEST L. PADILLA

