

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

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:**

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

**Case No. 20210**

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

**Case No. 20211**

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

**Case No. 20227**

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

**Case No. 20232**

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

**Case No. 20369**

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

**Case No. 20371**

**AMENDED (CONSOLIDATED) PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Lime Rock Resources II-A, L.P. ("Lime Rock") as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Lime Rock Resources II-A, L.P.  
Suite 4600  
1111 Bagby Street  
Houston, Texas 77002

Attention: Doug Lacey

**APPLICANT'S ATTORNEY**

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

OPPONENT

Percussion Petroleum Operating, LLC

OPPONENT'S ATTORNEY

Michael H. Feldewert

Adam G. Rankin

Ann Landrith Holdings, LLC

Ernest L. Padilla

**STATEMENT OF THE CASE**

APPLICANT

1. Case 20210: Lime Rock seeks an order pooling all mineral interests in the Yeso formation underlying a horizontal spacing unit comprised of the S/2N/2 of Section 13, Township 18 South, Range 26 East, NMPM and the SW/NW/4 of Section 18, Township 18 South, Range 27 East, NMPM. The unit will be dedicated to the Kaiser Well No. 18-1H, a horizontal well with a surface location in the SE/4NW/4 of Section 18, with a first take point in the SW/4NW/4 of Section 18 and a last take point in the SW/4NW/4 of Section 13.

2. Case 20211: Lime Rock seeks an order pooling all mineral interests in the Yeso formation underlying a horizontal spacing unit comprised of the N/2S/2 of Section 13, Township 18 South, Range 26 East, NMPM. The unit will be dedicated to the Leavitt Well No. 13-4H, a horizontal well with a surface location in the NW/4SW/4 of Section 18, Township 18 South, Range 27 East, N.M.P.M., with a first take point in the NE/4SE/4 and a last take point in the NW/4SW/4 of Section 13.

OPPONENT

Percussion Petroleum Operating, LLC ("Percussion") has filed competing cases in Case Nos. 20227, 20232, 20369, and 20371.

Lime Rock is by far the largest working interest owner in the well units, and requests that its applications be granted and Percussion's applications be denied.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Doug Lacey  
(landman)

20 min.

Approx. 4

Stan Bishop  
(geologist)

20 min.

Approx. 6

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

If Lime Rock's applications are unopposed they may be presented by affidavit.

Respectfully submitted,



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James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Lime Rock Resources II-A,  
L.P.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 22nd day of May, 2019 by e-mail:

Michael Feldewert  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

Adam Rankin  
[dmb@modrall.com](mailto:dmb@modrall.com)

Ernest L. Padilla  
[padillalaw.qwestoffice.net](mailto:padillalaw.qwestoffice.net)



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James Bruce