

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

**APPLICATION OF IMPETRO OIL & GAS, LLC
FOR COMPULSORY POOLING
LEA COUNTY, NEW MEXICO**

CASE NO. 20791

IMPETRO'S PRE-HEARING STATEMENT

ImPetro Oil & Gas, LLC ("ImPetro") through undersigned counsel, file this Pre-Hearing Statement pursuant to section 19.15.4.13.B NMAC.

APPEARANCES

APPLICANT
ImPetro Oil & Gas, LLC

APPLICANTS' ATTORNEY
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STATEMENT OF THE CASE

ImPetro Oil & Gas, LLC ("ImPetro" or "Applicant") seeks an order pooling all uncommitted interests in the Wolfcamp formation (Jal; Wolfcamp, West Pool) in the 640 acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 18 and 19, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the **Black Marlin Federal Com #1H** well to be drilled from a surface hole location in the NE/4 NE/4 (Unit B) of Section 18 (120' FNL and 1320' FEL), with a first take point 100' FNL and 1090' FEL of Section 18, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 19 (100' FSL and 1090' FEL) and the **Black**

Marlin Federal Com #2H well with a surface hole location in the NE/4 NE/4 (Unit A) of Section 18 (120' FNL and 1290' FEL) with a first take point 100' FNL and 330' FEL of Section 18, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 19 (100' FSL and 330' FEL). Also to be considered are Applicant's designation as the operator of the spacing unit and the wells, the cost of drilling and completing the wells and allocation of the costs thereof, as well as the actual operating charges and costs of supervision, and imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells.

PROPOSED EVIDENCE

Applicants' Proposed Evidence

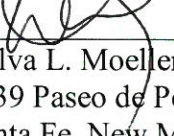
WITNESS	ESTIMATED TIME	EXHIBITS
Tracy Gibbs, Landman	15 minutes	Approx. 6
Nathan Guidorzi, Geologist	15 minutes	Approx. 4

PROCEDURAL MATTERS

As of the date of this Pre-Hearing Statement, no other person has appeared. In the event this case is unopposed, Applicant may request to submit this case for decision based upon affidavit.

RESPECTFULLY SUBMITTED

Gallagher & Kennedy, P.A.

By 
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