

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

**APPLICATION OF NOVO OIL & GAS  
NORTHERN DELAWARE, LLC  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NOS. 20815 AND 20816**

**NOVO'S CONSOLIDATED PRE-HEARING STATEMENT**

Novo Oil and Gas Northern Delaware, LLC ("Novo") (OGRID No. 372920), applicant in the above-referenced cases, submits this Consolidated Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Novo Oil & Gas Northern  
Delaware, LLC

**ATTORNEY**

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### APPLICANT'S STATEMENT OF CASE

In **Case No. 20815**, Novo seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation (Laguna Salado; Bone Spring (96721)) underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 W/2 of Sections 10 and 15, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the following proposed initial wells: the **Saturninus Fed Com 1510 #111H Well**, the **Saturninus Fed Com 1510 #121H Well**, and the **Saturninus Fed Com 1510 #131H Well**, each of which will be horizontally drilled from a common surface location in the SW/4 SW/4 (Unit M) of Section 15 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 10. The completed intervals of these wells will comply with statewide setbacks.

In **Case No. 20816**, Novo seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation (Laguna Salado; Bone Spring (96721)) underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of Sections 10 and 15, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the following proposed initial wells: the **Saturninus Fed Com 1510 #112H Well**, the **Saturninus Fed Com 1510 #122H Well**, and the **Saturninus Fed Com 1510 #132H Well**, each of which will be horizontally drilled from a common surface location in the SW/4 SW/4 (Unit M) of Section 15 to bottom hole locations in the NE/4 NW/4 (Unit C) of Section 10. The completed intervals of these wells will comply with statewide setbacks.

### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Brandon Patrick, Landman	Approx. 15	Approx. 8
Michael Hale, Geologist	Approx. 10	Approx. 4

### **PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

HOLLAND & HART LLP



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**CERTIFICATE OF SERVICE**

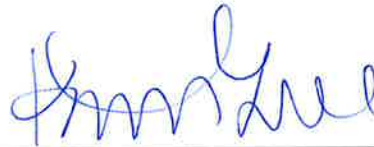
I hereby certify that on September 25, 2019, I filed with the Division clerk the foregoing document served a copy to the following counsel of record via Electronic Mail:

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