

**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 No. 20917

**BTA OIL PRODUCERS, LLC'S
PRE-HEARING STATEMENT**

BTA Oil Producers, LLC ("BTA") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Novo Oil & Gas Northern
Delaware, LLC

APPLICANT'S ATTORNEY

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OPPONENT

BTA Oil Producers, LLC

OPPONENT'S ATTORNEYS

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STATEMENT OF THE CASE

Applicant Novo Oil & Gas Northern Delaware, LLC (“Novo”) requests an order pooling all uncommitted mineral interests in the Bone Spring formation (from 8,773 feet subsurface as found in the Road Lizard 5 Fed Com Well No. 2H [API No. 30-015-39283] to the base of the Bone Spring formation) underlying a (proximity tract) horizontal spacing unit comprised of the N/2 of Section 8 and the N/2 of Section 9, Township 23 South, Range 29 East in Eddy County. Novo proposes to drill the Astrodog Fed Com 0809 Well Nos. 111H, 112H, 131H, 132H and 135H and dedicate the N/2 of Section 8 and the N/2 of Section 9 to the wells.

Pursuant to a Joint Operating Agreement, BTA is the operator of the acreage comprising the N/2 of Section 7 and the NW/4 of Section 8, Township 23 South, Range 29 East. Because Novo’s proposed well locations directly conflict with BTA’s ongoing development plan for that acreage, the granting of Novo’s application would result in an impairment of BTA’s correlative rights.

PROPOSED EVIDENCE

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Willis Price (landman)	15 minutes	Approximately 5
Britton McQuien (engineer)	15 minutes	Approximately 4
Nick Eaton (engineer)	15 minutes	Approximately 2

BTA reserves its right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

BTA is not aware of any procedural matters to be resolved prior to the hearing.

Respectfully submitted,

HINKLE SHANOR LLP



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Counsel for BTA Oil Producers, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of November, 2019 I served a true and correct copy of the foregoing ***Entry of Appearance*** via email to:

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*Counsel for Novo Oil & Gas Northern
Delaware, LLC*


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