

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

**APPLICATION OF RIDGE RUNNER RESOURCES
OPERATING, LLC FOR COMPULSORY POOLING,
NON-STANDARD SPACING AND PRORATION UNIT,
LEA COUNTY, NEW MEXICO**

CASE NO. 20660

PRE-HEARING STATEMENT

STEVENS & TULL DEVELOPMENT, LTD. ("Stevens & Tull"), provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

CENTENNIAL RESOURCE
DEVELOPMENT, LLC¹

APPLICANT'S ATTORNEYS:

Ernest L. Padilla
Padilla Law Firm, P.A.
P.O. Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577
padillalaw@qwestoffice.net

OPPONENT

STEVENS & TULL DEVELOPMENT,
LTD.

APPLICANT'S ATTORNEYS:

Sharon T. Shaheen, Esq.
John F. McIntyre, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
Telephone: (505) 986-2678
Email: sshaheen@montand.com
jmcintyre@montand.com

¹ Successor in interest to Ridge Runner Resources Operating, LLC

OTHER PARTY

MARATHON OIL PERMIAN LLC

OTHER PARTY'S ATTORNEY:

Deana M. Bennett
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
Email: dmb@modrall.com

STATEMENT OF THE CASE

In **Case No. 20660**, Applicant seeks an order from the Division pooling all mineral interests within the Bone Spring Formation, underlying Section 26, Township 20 South, Range 35 East, NMPM and Section 35, Township 20 South, Range 35 East, NMPM, Lea County, New Mexico Applicant proposes to drill (1) the proposed **Medusa 2635 State #1H** to be horizontally drilled to a depth sufficient to test the 2nd Bone Spring Sand formation from orthodox SHL 100'FNL & 2400'FWL of Section 26 to BHL 100'FSL & 1980'FWL of Section 35; (2) the proposed **Medusa 2635 State #2H** to be horizontally drilled to a depth sufficient to test the 2nd Bone Spring Sand formation from orthodox SHL 100'FNL & 330' FWL of Section 26 to BHL 100'FSL & 330'FWL of Section 35; (3) the proposed **Medusa 2635 State #3H** to be horizontally drilled to a depth sufficient to test the 2nd Bone Spring Sand formation from orthodox SHL 100'FNL & 1980'FEL of Section 26 to BHL 100'FSL & 1980'FEL of Section 35; and (4) the proposed **Medusa 2635 State #4H** to be horizontally drilled to a depth sufficient to test the 2nd Bone Spring Sand formation from orthodox SHL 100'FNL & 330' FEL of Section 26 to BHL 100'FSL & 330'FEL of Section 35.

Opponent Stevens & Tull opposes the Applicant from receiving a compulsory pooling order from the Division for the above-referenced wells because Applicant has failed to negotiate in good faith with Stevens & Tull to enter into a voluntary pooling agreement.

PROPOSED EVIDENCE

APPLICANT CENTENNIAL RESOURCE DEVELOPMENT, LLC:

WITNESSES	EST. TIME	EXHIBITS
TBD	TBD	TBD

OPPONENT STEVENS & TULL DEVELOPMENT, LTD.:

WITNESSES	EST. TIME	EXHIBITS
Bob Stevens	15-30	TBD

OTHER PARTY MARATHON OIL PERMIAN LLC:

WITNESSES	EST. TIME	EXHIBITS
TBD	TBD	TBD

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen

Sharon T. Shaheen
John F. McIntyre
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
Telephone: (505) 982-2678
Email: sshaheen@montand.com
jmcintyre@montand.com

Attorneys for Stevens & Tull Development, Ltd.

CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2020, a true and correct copy of the foregoing ***Pre-Hearing Statement*** was served by electronic mail on the following counsel of record:

Ernest L. Padilla
Padilla Law Firm, P.A.
P.O. Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577
padillalaw@qwestoffice.net

Attorney for Centennial Resource Production, LLC

Deana M. Bennett
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
Email: dmb@modrall.com

Attorney for Marathon Oil Permian LLC

/s/Sharon T. Shaheen