

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

**APPLICATIONS OF OSTRICH OIL AND GAS,
LLC FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 20988 and 20989

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted on behalf of Ostrich Oil and Gas, LLC, by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:

Ostrich Oil and Gas, LLC

ATTORNEY:

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

OPPOSITION OR OTHER PARTY:

Matador Production Company

James Bruce
PO Box 1056
Santa Fe, NM 87504
(505)982-2043
jamesbruc@aol.com

ConocoPhillips

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com
HOLLAND & HART

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of W/2 of Section 10, Township 22 South, Range 32 East, Lea County, New Mexico its proposed initial **Frizzle Freedom 10 BS Fed Com #1H well** to be drilled from a surface hole location in NW/4 NW/4 (Unit D) of Section 10, to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 10. The completed interval for the **Frizzle Freedom 10 BS Fed Com #1H well** will be with 330’ of the quarter-quarter line separating the W/2 W/2 and the E/2 W/2 of Section 10 to allow inclusion of this acreage into a standard 320-acre horizontal well spacing unit.

Applicant seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of W/2 of Section 10, Township 22 South, Range 32 East, Lea County, New Mexico its proposed initial **Frizzle Freedom 10 WC Fed Com #2H well** to be drilled from a surface hole location in NW/4 NW/4 (Unit D) of Section, 10, to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 10.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Scott Grifo Landman	approx. 15 minutes	approx. 8
Jason Goss Engineer	approx. 15 minutes	approx. 8
Mike Mattuecci Geologist	approx. 15 minutes	approx. 8

PROCEDURAL MATTERS

The Ostrich cases compete with Matador Production Cases Nos. 21063-21065. Undersigned counsel has been informed by Ostrich that it has accepted a purchase offer by Matador of its interests, but is awaiting closing of the transaction which will occur before the end of June. For that reason it has not prepared hearing exhibits and has asked counsel for Matador and ConocoPhillips for further continuance of one month pending finalization of the transaction. ConocoPhillips has consented to further continuance, and has not heard from Mr. Bruce as to Matador’s position. Nonetheless, Ostrich is filing this prehearing statement out of precaution and to inform the Division of the status of the cases.

PADILLA LAW FIRM, P.A.

/s/ Ernest L. Padilla

Ernest L. Padilla

Attorney for Ostrich Oil & Gas, LLC

PO Box 2523

Santa Fe, New Mexico 87504

505-988-7577

padillalawnm@outlook.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was served by e-mail to the following listed below on this 10th day of June, 2021.

James Bruce, jamesbruc@aol.com

Michael H. Feldewert, Esq.

mfeldewert@hollandhart.com

Adam G. Rankin, Esq.

agrarkin@hollandhart.com

Julia Broggi, Esq.

jbroggi@hollandhart.com

Kaitlyn A. Luck, Esq.

kaluck@hollandhart.com

/s/ Ernest L. Padilla

Ernest L. Padilla