



**MONTGOMERY
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2013 OCT 15 P 1:14

October 15, 2013

Ms. Jami Bailey, Director
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87504

HAND DELIVERED

Re: NMOCD Case No. 15055: In the Matter of the Application of Sundown Energy LP for Unit Approval, Lea County, New Mexico

Dear Ms. Bailey:

On behalf of Sundown Energy, LP enclosed for filing is an original and one copy of Sundown's Pre-Hearing Statement in the above-captioned case.

Thank you.

Very truly yours,

Loretta Baca
Assistant to J. Scott Hall

Enclosures

504860

REPLY TO:

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

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IN THE MATTER OF THE APPLICATION
OF SUNDOWN ENERGY LP FOR UNIT
APPROVAL, LEA COUNTY, NEW MEXICO

Case No. 15055

PRE-HEARING STATEMENT

Sundown Energy, LP ("Sundown") provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

Sundown Energy, LP

APPLICANT'S ATTORNEY

J. Scott Hall
Montgomery & Andrews
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873

OTHER PARTY

OTHER PARTY'S ATTORNEY

STATEMENT OF THE CASE

Applicant seeks an order pursuant to 19.15.20.14 NMAC approving its Reeves-Queen Waterflood Unit, the Unit Area of which is comprised of 520 acres \pm of State of New Mexico lands located in Lea County, New Mexico described as follows:

Township 18 South, Range 35 East, NMPM

Section 21: SE/4 SE/4
Section 22: SW/4
Section 27: NW/4
Section 28: NE/4

The Unitized Formation for the Reeves-Queen Waterflood Unit is the Queen formation 100' above and 100' below the correlative interval as found in the Reeves State 21 (API #30-025-30514) Compensated Neutron-Litho Density Log from 4,430' – 4,490'. The Unit and lands are located approximately ten miles west of Hobbs, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Kyle Paxton, Landman
(appearing by affidavit)

EST. TIME

10 min.

EXHIBITS

6

OPPONENT

WITNESSES

EST. TIME

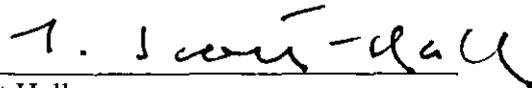
EXHIBITS

PROCEDURAL MATTERS

None

Montgomery and Andrews, P. A.

By:



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shall@montand.com
Attorneys for Sundown Energy, LP

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 24 of October, 2013.

N.A.

J. Scott Hall

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