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December 8, 2014

Florene Davidson Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Florene:

Enclosed for filing, on behalf of RMR Operating, LLC in Case No. 15248, are a pre-hearing statement and affidavits to support its unopposed case for force pooling, etc. A proposed order will be e-mailed to the Division.

Very truly yours,

lames Bruce

Attorney for RMR Operating, LLC

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STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION U(1)

IN THE MATTER OF THE HEARING CALLED

BY THE OIL CONSERVATION DIVISION FOR

THE PURPOSE OF CONSIDERING:

APPLICATION OF RMR OPERATING, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 15248

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

RMR Operating, LLC Suite 900

2515 McKinney Avenue

Dallas, Texas 75201

APPLICANT'S ATTORNEY

James Bruce

P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attention:

Robert B. Wilson (214) 871-0400

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order approving a 234.75-acre non-standard oil spacing and proration unit (project area) in the Delaware formation comprised of the W/2E/2 of Section 25, and Lot 2 and the NW/4NE/4 of Section 36, Township 26 South, Range 34 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Delaware formation underlying the non-standard oil spacing and proration unit (project area) for all pools or formations developed on 40 acre spacing within that vertical extent. The unit will be dedicated to the Madera 25 Fed. Com. Well No. 2H, a horizontal well with a surface location in the NW/4NE/4 of Section 25, and a terminus in Lot 2 of Section 36. Also to be considered will be the designation of applicant as operator of the well.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Robert B. Wilson (landman)	10 min.	Approx. 3
Jack Bradley (geologist)	10 min.	Approx. 4

OPPONENT

WITNESSES	EST. TIME	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

The only parties being pooled are deceased record title owners under a federal oil and gas lease, who own no cost-bearing interests, so applicant intends to present the case by affidavit.

Respectfully submitted,

James Bruce

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Attorney for RMR Operating, LLC