



MODRALL SPERLING
LAWYERS

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January 12, 2017

Florene Davidson
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

**Re: Case No. 15619
APPLICATION OF CIMAREX ENERGY CO. FOR A NON-
STANDARD OIL SPACING AND PRORATION UNIT,
PROJECT AREA AND COMPULSORY POOLING, EDDY
COUNTY, NEW MEXICO**

Dear Ms. Davidson:

Enclosed please find three copies of the following:

1. Cimarex's Pre-Hearing Statement (No. 15619).

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,



Jennifer L. Bradlute

JLB/zc
Enclosure

Modrall Sperling
Roehl Harris & Sisk
P.A.

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

**APPLICATION OF CIMAREX
ENERGY CO. FOR A NON-STANDARD
OIL SPACING AND PRORATION UNIT,
PROJECT AREA AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 15619

CIMAREX'S PRE-HEARING STATEMENT

Cimarex Energy Co. ("Cimarex"), submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Cimarex Energy Co.
600 N. Marienfeld Street
STE 600
Midland, TX 79701

ATTORNEY

Earl E. DeBrine, Jr., Esq.
Jennifer L. Bradfute, Esq.
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
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OPPONENT: None anticipated.

STATEMENT OF CASE

APPLICANT:

Applicant in the above-styled cause seeks an order approving a non-standard project area and oil spacing and proration unit in the Bone Spring formation and pooling of all uncommitted mineral interests in the Bone Spring formation underlying the N/2 N/2 of Sections 26 and 27 and the NE/4 NE/4 of Section 28, Township 19 South, Range 30 East, NMPM, Eddy County, New Mexico.

Cimarex seeks an order from the Division: (1) creating a non-standard 360-acre, more or less, oil spacing and proration unit and non-standard project area in the Bone

Spring formation, comprised of the N/2 N/2 of Sections 26 and 27 and the NE/4 NE/4 of Section 28, Township 19 South, Range 30 East, NMPM, Eddy County, New Mexico; and, (2) pooling all mineral interests in the Bone Spring formation underlying this proposed non-standard project area and spacing and proration unit.

This proposed non-standard spacing and proration unit will be the project area for the **Hackberry 26 Federal Com 1H** well, to be horizontally drilled. Also to be considered will be the cost of drilling and completing said well, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Cimarex as operator of the well, and a 200% charge for risk involved in drilling said well. Said area is located approximately 31 miles southeast of Carlsbad, New Mexico.

OPPONENT: None anticipated.

PROPOSED EVIDENCE

APPLICANT:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Kelly Reese – Landman	Approx. 15	Approx. 5
Lauren Copley – Geologist	Approx. 10	Approx. 4
Adam Meeks – Engineer	Approx. 10	Approx. 4

PROCEDURAL MATTERS

Cimarex does not have any procedural matters at this time.

Respectfully submitted,

**MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.**

By: 
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