

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

**IN THE MATTER OF THE HEARING CALLED BY  
THE OIL CONSERVATION DIVISION FOR THE  
PURPOSE OF CONSIDERING:**

**CASE NO. 13489  
(Reopened)**

**APPLICATION OF MCQUADRANGLE, L.C. FOR  
STATUTORY UNITIZATION OF THE SOUTH RED  
LAKE II UNIT AREA, EDDY COUNTY, NEW  
MEXICO**

**APPLICANT'S PRE-HEARING STATEMENT**

Applicant hereby submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

McQuadrangle, LC  
Attn: Delbert McDougal  
7008 Salem Avenue  
Lubbock, Texas 79424  
(806) 797-3162

**ATTORNEY**

Ocean Munds-Dry, Esq.  
Holland & Hart, LLP  
P. O. Box 2208  
Santa Fe, NM 87504-2208  
(505) 988-4421

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**APPLICANT'S STATEMENT OF CASE**

Applicant in the above-styled cause seeks a supplemental order pursuant to the provisions of N.M.S.A. § 70-7-8 (2006) that the plan for unit operations has been approved by at least seventy-five percent of the working interest owners in the South Red Lake II Unit and that the Unit can now become effective pursuant to Order No. R-12386. By Order No. R-12386, entered on July 19, 2005, the Division approved the application of McQuadrangle, LC for statutory unitization of the South Redlake II Unit area in Eddy County, New Mexico. In its order, the Division required that the

description of the unitized interval be revised and the agreement be re-ratified. McQuadrangle made the required revision and has sought and acquired re-ratification of the unit. Said unit area is located approximately 16 miles southeast of Artesia, New Mexico.

**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS</b> (Name and Expertise)	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
By Affidavit		

**PROCEDURAL MATTERS**

McQuadrangle, L.C. has none at this time.

Respectfully submitted,

HOLLAND & HART, LLP

By: *Ocean Munds-Dry*  
William F. Carr  
Ocean Munds-Dry  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, NM 87504-2208  
505/988-4421

Attorneys for McQuadrangle, L.C.