

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

APPLICATION OF RKI EXPLORATION  
AND PRODUCTION, LLC FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 16401

RKI'S PRE-HEARING STATEMENT

RKI Exploration and Production, LLC, the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

RKI Exploration and Production, LLC  
3500 One Williams Center, MD 35  
Tulsa, OK 74172

ATTORNEY

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Adam G. Rankin, Esq.  
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APPLICANT'S STATEMENT OF CASE

RKI Exploration and Production ("RKI") seeks an order pooling all mineral interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) in the 319.80-acre, more or less, spacing and proration unit comprised of the N/2 of Section 4, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico. The spacing unit will be dedicated to the **Bindel 4 Fee No. 1H Well**, which will be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) to a standard bottom hole location in in the SW/4 NW/4 (Unit E) of Section 4. The completed interval

for this well will remain within the standard offset required by the Special Rules set forth in Order No. R-14262.

**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Aaron Young—Landman	Approx. 10	Approx. 5
Kasmira Workman—Geologist	Approx. 10	Approx. 3

**PROCEDURAL MATTERS**

If uncontested, this case will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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**ATTORNEYS FOR  
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