

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

**APPLICATION OF NOVO OIL AND GAS NORTHERN
DELAWARE, LLC FOR COMPULSORY POOLING, EDDY
COUNTY, NEW MEXICO.**

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CASE NO. 20184

**APPLICATION OF NOVO OIL AND GAS NORTHERN
DELAWARE, LLC FOR COMPULSORY POOLING, EDDY
COUNTY, NEW MEXICO.**

CASE NO. 20185

NOVO's CONSOLIDATED PRE-HEARING STATEMENT

Novo Oil and Gas Northern Delaware, LLC ("Novo") (OGRID No. 372920), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Novo Oil and Gas Northern Delaware, LLC
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Oklahoma City, OK 73116

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In Case No. 20184, Novo seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) in the 320-acre, more or less, horizontal spacing unit comprised of the W/2 of Section 4, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Novo seeks to dedicate the above-referenced horizontal spacing unit to its proposed **Goonch Fed Com 04 No. 211H Well**, which will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) to a standard bottom hole location in in the NW/4 NW/4 (Unit D) of Section 4. The completed interval for this well will remain within the 330-foot setbacks required by the Special Rules for the Purple Sage Wolfcamp Gas Pool set forth in Order No. R-14262.

In Case No. 20185, Novo seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) in the 640-acre, more or less, horizontal spacing unit comprised of the E/2 of Section 4 and the E/2 of Section 9, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Novo seeks to dedicate the above-referenced horizontal spacing unit to its proposed **Goonch Fed Com 0409 No. 214H Well**, which will be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 33, Township 22 South, Range 28 East, to a standard bottom hole location in in the SE/4 SE/4 (Unit P) of Section 9, Township 23 South, Range 28 East. The completed interval for this well will remain within the 330-foot setbacks required by the Special Rules for the Purple Sage Wolfcamp Gas Pool set forth in Order No. R-14262.

APPLICANT'S PROPOSED EVIDENCE

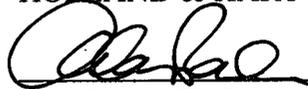
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Patrick, Landman	Approx. 15	Approx. 8

PROCEDURAL MATTERS

Applicant intends to present Case Nos. 20184 and 20185 by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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