

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

JAN 09 2019 PM 03:20

**APPLICATION OF PERCUSSION  
PETROLEUM OPERATING, LLC FOR  
COMPULSORY POOLING, EDDY COUNTY,  
NEW MEXICO.**

**CASE NO. 20192**

**PERCUSSION PETROLEUM OPERATING, LLC'S  
PRE-HEARING STATEMENT**

Percussion Petroleum Operating, LLC ("Percussion") (OGRID No. 371755), the applicant in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Percussion Petroleum Operating, LLC

**ATTORNEY**

Michael H. Feldewert, Esq.  
Adam G. Rankin, Esq.  
Jordan L. Kessler, Esq.  
Julia Broggi, Esq.  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jlkessler@hollandhart.com  
jbroggi@hollandhart.com

**APPLICANT'S STATEMENT OF CASE**

Percussion seeks an order pooling all uncommitted interests in the Artesia; Glorieta Yeso Pool (96830) comprised of the N/2N/2 of Section 28, Township 17 South, Range 28 East, NMPM, Eddy County, New Mexico. Said horizontal spacing unit is to be dedicated to applicant's proposed

**Welch RL State No. 1H Well**, which will be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 27 to a standard bottom hole location in the NW/4 NW/4 (Unit D) of Section 28. The well will be at an orthodox location pursuant to Statewide rules for oil wells.

**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Joe Dichiara, Landman	Approx. 10	Approx. 5
C.J. Lipinski, Geologist	Approx. 10	Approx. 4

Respectfully submitted,

HOLLAND & HART LLP

By:  \_\_\_\_\_

Michael H. Feldewert  
Jordan L. Kessler  
Adam G. Rankin  
Julia Broggi  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jlkessler@hollandhart.com  
jbroggi@hollandhart.com

**ATTORNEYS FOR PERCUSSION PETROLEUM  
OPERATING, LLC**