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

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

**CASE NO. 20226** 

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

Percussion Petroleum Operating, LLC ("Percussion") (OGRID No. 371755) submits the

following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

#### **APPEARANCES**

### <u>APPLICANT</u> <u>ATTORNEY</u>

Percussion Petroleum Operating, LLC Michael H. Feldewert, Esq.

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#### <u>OPPONENT</u> <u>ATTORNEY</u>

Vanguard Natural Resources, Inc. Ernest L. Padilla

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#### **APPLICANT'S STATEMENT OF CASE**

Percussion is seeking an order pooling all uncommitted interests in the 160-acre horizontal spacing unit in the Red Lake Glorieta-Yeso Pool (51120) comprised of the S/2 N/2 of Section 5, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Percussion further seeks to dedicate the above-referenced spacing unit to the **Carter Collier 5 Fed Com No. 10H Well**, to be drilled from a surface location in the SW/4NW/4 (Lot 9) of Section 4 to a standard bottom-hole location in the SW/4NW/4 (Unit E) of Section 5.

#### <u>APPLICANT'S PROPOSED EVIDENCE</u>

WITNESS	ESTIMATED TIME	<b>EXHIBITS</b>
Name and Expertise K. Samuel Jones, Landman	Approx. 20	Approx. 5
CJ Lipinski, Geologist	Approx. 20	Approx. 4
Brian Zwart, Petroleum Engineer	Approx. 20	Approx. 5

## PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP

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ATTORNEYS FOR PERCUSSION PETROLEUM OPERATING, LLC

# **CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2019, I filed with the Division clerk the foregoing document served a copy to the following counsel of record via Electronic Mail:

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