

**Ann Landrith Holdings, LLC**  
**PO Box #3363 Tulsa, OK 74101**  
**918.237.5454**

March 13<sup>th</sup>, 2019

New Mexico Oil Conservation Division  
Florene Davidson, Commission Clerk  
1220 S. Francis Drive  
Santa Fe, NM 87505  
[florene.davidson@state.nm.us](mailto:florene.davidson@state.nm.us)

RE: Pre-Hearing Statement regarding Case Nos. 20210 and 20211  
(Kaiser Well No. 18-1H and Leavitt Well No. 13-4H)

Dear Commission Clerk,

As manager of Ann Landrith Holdings, LLC ("ALH"), I'd like to contest the referenced cases. I have not yet secured legal counsel, so I will be representing ALH and myself on Thursday, March 21<sup>st</sup> 2019.

Summary:

1. The current mineral lease in effect was executed by my family in 1954 and does not allow for pooling beyond 43 acres for oil and 640 acres for gas.
2. Lime Rock requested an amendment to the current mineral lease to allow them to develop the lease in accordance with the revised NMOCD rules, but would not agree to any form of equitable compensation (neither bonus nor an adjustment to the 1/8<sup>th</sup> royalty interest).
3. Because of the significant change in circumstances since 1954 and because ALH's share will be diluted contrary to the current mineral lease without any consideration, I am requesting a continuance to find legal representation and seek fair and equitable compensation.

I anticipate I would need 10 minutes to present in the first case. Perhaps 5 minutes in the second referenced case.

Thank you very much for your consideration,



Adam J. Leavitt, Manager  
Ann Landrith Holdings, LLC