

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

JUL 03 2019 PM 03:25

**APPLICATION OF BTA OIL PRODUCERS,
LLC FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

Case No. 20589

**BTA OIL PRODUCERS, LLC
PRE-HEARING STATEMENT**

BTA Oil Producers, LLC (“BTA”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

BTA is the applicant in this case. Its business address is 104 South Pecos, Midland, Texas 79701. BTA is represented by the undersigned counsel.

STATEMENT OF THE CASE

BTA’s application seeks an order pooling all uncommitted mineral interests in the Wolfcamp formation in a 480-acre standard horizontal spacing unit comprised of the E/2 of Section 29 and the NE/4 of Section 32, Township 23 South, Range 28 East in Eddy County, New Mexico.

BTA proposes to dedicate the horizontal spacing unit to the following wells:

- the Ogden 20509 29-32 Fed Com #1H, which has a surface location in Unit B in Section 29 and a bottom hole location in Unit H in Section 32;
- the Ogden 20509 29-32 Fed Com #2H, which has a surface location in Unit B in Section 29 and a bottom hole location in Unit H in Section 32;

- the Ogden 20509 29-32 Fed Com #3H, which has a surface location in Unit B in Section 29 and a bottom hole location in Unit G in Section 32; and
- the Ogden 20509 29-32 Fed Com #4H, which has a surface location in Unit B in Section 29 and a bottom hole location in Unit G in Section 32.

PROPOSED EVIDENCE

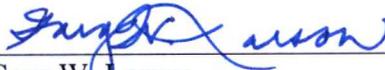
<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Willis Price (Landman)	10 minutes	Approx. 10
Rajendra Eti (Geologist)	10 minutes	Approx. 8

BTA reserves the right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

BTA is not aware of any procedural matters to be resolved prior to the hearing. If there is no objection, BTA will present its case by affidavit.

HINKLE SHANOR, LLP



Gary W. Larson
Dana S. Hardy
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
glarson@hinklelawfirm.com
dhardy@hinklelawfirm.com

Counsel for BTA Oil Producers, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of July 2019 I served a true and correct copy of **BTA Oil Producers, LLC Pre-Hearing Statement** via email to:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
HOLLAND & HART, LLP
Post Office Box 2208
Santa Fe, NM 87504
Telephone: (505) 988-4421
Facsimile: (505) 983-6043
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

Counsel for MRC Permian, LLC.



Gary W. Larson