

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

**APPLICATION OF SPUR ENERGY
PARTNERS, LLC FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NO. _____

APPLICATION

Spur Energy Partners, LLC (“Spur” or “Applicant”) (OGRID No. 338479) through its undersigned attorneys, hereby files this application with the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all uncommitted interests in the Yeso formation underlying a standard 320-acre horizontal spacing unit comprised of the NW/4 of Section 27 and the NE/4 of Section 28, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico. In support of its application, Spur states:

1. An affiliate entity of Spur is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon.
2. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed initial wells:
 - The **Live Oak #1H well**, the **Live Oak #10H well**, the **Live Oak #50H well**, and the **Live Oak #60H well**, each of which will be horizontally drilled from a common surface location in the NW/4 NE/4 (Unit B) of Section 27 to bottom hole locations in the NW/4 NE/4 (Unit B) of Section 28; and
 - The **Live Oak #20H well**, to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 27 to bottom hole locations in the SW/4 NE/4 (Unit G) of Section 28.

3. The completed intervals of the **Live Oak #1H well**, the **Live Oak #20H well**, and the **Live Oak #50H well** will remain within 330 feet of the quarter-quarter line separating the N/2 NW/4 from the S/2 NW/4 of Section 27, and the N/2 NE/4 from the S/2 NE/4 of Section 28 to allow inclusion of these proximity tracts into a standard horizontal spacing unit.

4. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all of the interest owners in the subject spacing unit.

5. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

6. In order to permit Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this horizontal spacing unit should be pooled and Applicant should be designated the operator of the proposed horizontal spacing unit and proposed initial wells.

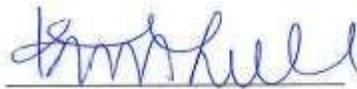
WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on January 7, 2021, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the horizontal spacing unit in the Yeso formation and approving the initial wells thereon;
- B. Designating Applicant as operator of this spacing unit and the horizontal wells to be drilled thereon;
- C. Authorizing Applicant to recover its costs of drilling, equipping, and completing the wells;

- D. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- E. Imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells against any working interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

HOLLAND & HART LLP



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