

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

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

CASE NO. \_\_\_\_\_

**APPLICATION**

Redwood Operating LLC (“Redwood” or “Applicant”) (OGRID No. 330211) 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 a 160-acre, more or less, horizontal well spacing unit in the Yeso formation comprised of the N/2 N/2 of Section 11, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico. In support of its application, Applicant states:

1. Redwood is the duly authorized contract operator for Pecos Oil & Gas LLC, which is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon. Pecos Oil & Gas LLC has authorized Redwood to file this application for compulsory pooling on its behalf.

2. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed initial wells: the **Brainard 11 #2H well** and the **Brainard 11 #3H well**, both of which are to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 12, Township 18 South, Range 26 East, to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 11, Township 18 South, Range 26 East.

3. 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.

4. Approval of this horizontal well spacing unit and the pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

5. 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 the proposed initial well.

WHEREFORE, Redwood Operating LLC requests that this application be set for hearing before an Examiner of the Oil Conservation Division, on June 2, 2022, and, after notice and hearing as required by law, the Division enter an order:

- A. Approving the horizontal well spacing unit and pooling all uncommitted interests in the horizontal spacing unit and approving the initial well 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 well;
- 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 well 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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