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

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NOS. 22995, 22996, 22997

PRE-HEARING STATEMENT

Novo Oil & Gas Northern Delaware, LLC ("Novo" or "Applicant") submits this Pre-

Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation

Division.

APPEARANCES

APPLICANT

ATTORNEY

ATTORNEY

Novo Oil & Gas Northern Delaware, LLC

Earl E. DeBrine, Jr. Deana M. Bennett Jamie L. Allen Bryce H. Smith MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A. P. O. Box 2168 Albuquerque, NM 87103

INTERESTED PARTY

MRC Delaware Resources, LLC

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck HOLLAND & HART, LLP Post Office Box 2208 Santa Fe, NM 87504-2208

STATEMENT OF CASES

In Case No. 22995 Novo seeks an order from the Oil Conservation Division pooling all

uncommitted mineral interests within a Wolfcamp horizontal spacing unit underlying the W/2

of Section 26 Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. The spacing unit will be dedicated to the Crocubot Fed 26 211H, Crocubot Fed 26 212H, Crocubot Fed 26 231H, and Crocubot Fed 26 232H wells, to be horizontally drilled. The wells will be drilled at orthodox locations. The completed interval for the Crocubot Fed 26 211H and the Crocubot Fed 26 212H wells will be less than 330' from the adjoining tracts to allow inclusion of proximity tracts within the proposed standard horizontal spacing unit.

In Case No. 22996 Novo seeks an order from the Oil Conservation Division pooling all uncommitted mineral interests within a Bone Spring horizontal spacing unit underlying the W/2W/2 of Section 26, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. The spacing unit will be dedicated to the Crocubot Fed 26 135H and Crocubot Fed 26 131H wells, to be horizontally drilled. The wells will be drilled at orthodox locations.

In Case No. 22997 Novo seeks an order from the Oil Conservation Division pooling all uncommitted mineral interests within a Bone Spring horizontal spacing unit underlying the E/2W/2 of Section 26, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. The spacing unit will be dedicated to the Crocubot Fed 26 215H and Crocubot Fed 26 132H wells, to be horizontally drilled. The wells will be drilled at orthodox locations.

PROPOSED EVIDENCE

<u>WITNESS</u>	ESTIMATED TIME	<u>EXHIBITS</u>
Peter Schmidt, Landman	Approx. 5 minutes	Approx. 5
Michael Hale, Geologist	Approx. 5 minutes	Approx. 5

APPLICANT:

PROCEDURAL ISSUES

Novo is not aware of any opposition, requests for continuances, or any other procedural

issues these cases. Accordingly, Novo does not anticipate opposition and intends to present these

cases by affidavit.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By: <u>/s/ Earl E. DeBrine, Jr.</u>

Earl E. DeBrine, Jr. Deana M. Bennett Jamie L. Allen Bryce H. Smith Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 edebrine@modrall.com dbennett@modrall.com jallen@modrall.com

Attorneys for Novo Oil & Gas Northern Delaware LLC

CERTIFICATE OF SERVICE

We hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by e-mail on August 25, 2022:

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck HOLLAND & HART, LLP Post Office Box 2208 Santa Fe, NM 87504-2208 <u>mfeldewert@hollandhart.com</u> <u>agrankin@hollandhart.com</u> <u>jbroggi@hollandhart.com</u> <u>kaluck@hollandhart.com</u> *Attorneys for MRC Delaware Resources, LLC*

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By: <u>/s/ Earl E. DeBrine, Jr.</u> Earl E. DeBrine, Jr.

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State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

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Action 138299

QUESTIONS

Operator:	OGRID:
NOVO OIL & GAS NORTHERN DELAWARE, LLC	372920
1001 West Wilshire Blvd	Action Number:
Oklahoma City, OK 73116	138299
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

	estimony		
	Please assist us by provide the following information about your testimony.		
I	Number of witnesses	Not answered.	
	Testimony time (in minutes)	Not answered.	