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

APPLICATION OF TASCOSA ENERGY PARTNERS, LLC TO EXTEND TIME TO COMMENCE DRILLING OPERATIONS, EDDY COUNTY, NEW MEXICO.

CASE NO. 24298 ORDER NO. R-22741

#### PRE-HEARING STATEMENT

Tascosa Energy Partners, LLC ("Tascosa" or "Applicant") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT ATTORNEYS

Tascosa Energy Partners, LLC Dana S. Hardy

Jaclyn McLean Hinkle Shanor LLP P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

INTERESTED PARTY ATTORNEYS

None.

#### STATEMENT OF THE CASE

Applicant applies for an order extending the deadline to commence drilling the Ventura 3233 Fed Com #301H, Ventura 3233 Fed Com #201H, Ventura 3233 Fed Com #602H, Ventura 3233 Fed Com #202H, and Ventura 3233 Fed Com #303H ("Wells") under Order No. R-22741 ("Order"). The Division issued the Order in Case No. 24298 on June 7, 2023. The Order: pooled all uncommitted interests in the Bone Spring formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Sections 32 and 33, Township 20 South, Range 27 East, Eddy County, New Mexico ("Unit"); dedicated the Unit to the Wells; and

designated Applicant as operator of the Unit and Wells. The Order provides that it shall terminate if Tascosa fails to commence drilling the Wells by June 7, 2024, unless good cause is shown.

Good cause for an extension exists because Tascosa needs to simultaneously frac the Wells in the Unit to avoid reservoir damage, and the drilling rig is not available prior to the expiration of the Order. Accordingly, Tascosa requests that the Division extend the deadline to commence drilling the Wells to June 7, 2025.

### **PROPOSED EVIDENCE**

Witness	Occupation	<b>Estimated Time</b>	Exhibits
John Shoberg	Landman	Affidavit	Approx. 2

## **PROCEDURAL MATTERS**

Applicant will present this matter by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy Jaclyn McLean

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

Counsel for Tascosa Energy Partners, LLC

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720 District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 327655

#### **QUESTIONS**

Operator:	OGRID:
Tascosa Energy Partners, L.L.C	329748
901 W. Missouri Ave	Action Number:
Midland, TX 79701	327655
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

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