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

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

CASE NOS. 24394 & 24395

CONSOLIDATED PRE-HEARING STATEMENT

Novo Oil & Gas Northern Delaware, LLC ("Novo" or "Applicant") submits its

Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

Novo Oil & Gas Northern Delaware, LLC

ATTORNEYS

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

Marathon Oil Permian, LLC

ATTORNEYS

Deana M. Bennett Earl E. DeBrine, Jr. Yarithza Peña Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, NM 87103-2168 (505) 848-1800 deana.bennett@modrall.com earl.debrine@modrall.com yarithza.pena@modrall.com

STATEMENT OF THE CASES

In Case No. 24394, Applicant seeks an order pooling all uncommitted interests in the

Bone Spring formation underlying a 160.2 acre, more or less, standard horizontal spacing unit

comprised of the W/2 W/2 of Section 4, Township 23 South, Range 28 East, Eddy County, New Mexico. The Unit will be dedicated to the **Goonch Federal Com 111H** and **Goonch Federal Com 121H** wells, which will be drilled from surface hole locations in the SW/4 SW/4 (Unit M) of Section 4 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 4

In **Case No. 24395**, Applicant seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a 160.21 acre, more or less, standard horizontal spacing unit comprised of the E/2 W/2 of Section 4, Township 23 South, Range 28 East, Eddy County, New Mexico. The Unit will be dedicated to the **Goonch Federal Com 112H** and **Goonch Federal Com 122H** wells, which will be drilled from surface hole locations in the SW/4 SW/4 (Unit M) of Section 4 to bottom hole locations in the NE/4 NW/4 (Unit C) of Section 4.

The completed intervals of the wells will be orthodox. Also to be considered in each case will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as the operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

The wells are located approximately 16 miles west of Eunice, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Collin Christian	Landman	Affidavit	Approx. 5
Tyler Chesworth	Geologist	Affidavit	Approx. 6

PROCEDURAL MATTERS

Applicant intends to consolidate these matters for hearing and will present these matters by affidavit if there is no opposition. Respectfully submitted,

HINKLE SHANOR LLP

<u>/s/ Dana S. Hardy</u> Dana S. Hardy Jaclyn McLean Dylan M. Villescas P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com dvillescas@hinklelawfirm.com *Counsel for Novo Oil & Gas Northern Delaware, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2024, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Deana M. Bennett Earl E. DeBrine, Jr. Yarithza Peña Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 deana.bennett@modrall.com earl.debrine@modrall.com yarithza.pena@modrall.com *Counsel for Marathon Oil Permian LLC*

> /s/ Dana S. Hardy Dana S. Hardy

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

District IV 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

Page 4 of 4

Action 368569

QUESTIONS

Operator:	OGRID:
Permian Resources Operating, LLC	372165
300 N. Marienfeld St Ste 1000	Action Number:
Midland, TX 79701	368569
	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.	