

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

**APPLICATION OF ALPHA ENERGY
PARTNERS II, LLC, TO POOL ADDITIONAL
INTERESTS UNDER ORDER NO. R-23005,
EDDY COUNTY, NEW MEXICO**

**Case No. 25186
Order No. R-23005**

PREHEARING STATEMENT

Alpha Energy Partners II, LLC (“Alpha” or “Applicant”), affiliate successor in interest in the Subject Lands to Alpha Energy Partners, LLC (“Alpha”), through its undersigned attorneys, submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division (“Division”) for the above-referenced case.

APPEARANCES

ATTORNEY

APPLICANT

Alpha Energy Partners, LLC

Darin C. Savage
Andrew D. Schill
William E. Zimsky
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

INTERESTED PARTY
MRC Permian Company

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Fax

mfeldewert@hollandandhart.com
agrarkin@hollandandhart.com
pmvance@hollandandhart.com

APPLICANT'S STATEMENT OF CASE

In Case No. 25186, Alpha seeks an order for the purpose of (1) pooling newly found additional uncommitted mineral interests under the terms of Division Order No. R-23005 (the "Order"), which pooled uncommitted interest in the Wolfcamp formation underlying a 634.28-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Sections 19 and 20, Township 22 South, Range 27 East, Eddy County, New Mexico ("Subject Lands" under the Order); (2) to advise the Division and affected parties that Alpha has entered into a farmout agreement with Paloma Permian AssetCO, LLC ("Paloma") by which Paloma, OGRIG No. 332449, has the right to earn a portion of Alpha's working interest in the Subject Lands by drilling, completing, and operating the proposed wells under the supervision of Alpha; and (3) providing notice for wells which have undergone certain name changes and adjustments.

1. The Dude 19/20 Fee 201H Well, with a proposed surface hole location (SHL) in the NE/4 NE/4 (Unit A) of Section 20 to a bottom hole location (BHL) in Lot 1 (NW/4 NW/4) (Unit D) of Section 19, has been renamed and revised as **The Dude 20-19 Fee 704H**, which maintains the same quarter-quarter section for the SHL (Units A and D) for its SHL and BHL and remains orthodox; FTP and LTP also in Units A and D, respectively; this initial well is re-dedicated to the spacing unit as The Dude 20-19 Fee 704H Well.

2. The Dude 19/20 Fee 202H Well, with a proposed SHL in the NE/4 NE/4 (Unit A) of Section 20 to a BHL in Lot 2 (SW/4 NW/4) (Unit E) of Section 19, has been renamed and

revised as **The Dude 20-19 Fee 703H Well**, which maintains the same quarter-quarter section (Units A) for its SHL and its BHL is in Unit E, with FTP and LTP in Units A and E, respectively; the 703H remains orthodox; this initial well is re-dedicated to the spacing unit as The Dude 20-19 Fee 703H Well.

3. Alpha and Paloma have also updated their well proposals, the updates sent on October 31, 2024, to working interest owners in the unit, to include the 704H and 703H Well and to propose two additional wells for the lower part of the Wolfcamp formation: **The Dude 20-19 Fee 802H Well** with a SHL located in the NE/4 NE/4 (Unit A) of Section 20 and a BHL located in Lot 2 (SW/4 NW/4) (Unit E) of Section 19, the FTP and LTP being in Unit A and Unit E, respectively; and **The Dude 20-19 Fee 803H Well** with a SHL located in the NE/4 NE/4 (Unit A) and the BHL located in Lot 1 (NW/4 NW/4) (Unit D), the FTP and LTP being in Unit A and D, respectively; the 802H and the 803H are added and dedicated to the unit as initial wells. The completed intervals of the 802H and 803H are orthodox.

APPLICANT'S PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Riley Morris	Approx. 10 min	Approx. 5
Geologist: Jason McClain	Approx. 10 min	Approx. 5

PROCEDURAL MATTERS

No party has formally objected to this case; therefore, Alpha plans to proceed by affidavit.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ Darin C. Savage

Darin C. Savage

William E. Zimsky
Andrew D. Schill
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
bill@abadieschill.com
andrew@abadieschill.com

Attorneys for Alpha Energy Partners II, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed with the New Mexico Oil Conservation Division and was served on counsel of record via electronic mail on March 6, 2025:

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com
Attorneys for MRC Permian Company

/s/ Darin C. Savage

Darin C. Savage

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 439929

QUESTIONS

Operator: AEP II Operating LLC P.O. Box 10701 Midland, TX 79702	OGRID: 332909
	Action Number: 439929
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	2
Testimony time (in minutes)	20