# Lawrence D. Garcia

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May 18, 2011

# **DELIVERED BY FEDERAL EXPRESS**

Ms. Florene Davidson
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**CASE NO. 14630** 

Re: Pre-Hearing Statement in the Matter of the

Application of Lime Rock Resources A, L.P.,

for Designation of Non-Standard Spacing Unit and

for Compulsory Pooling, Eddy County, New Mexico

Dear Ms. Davidson:

Enclosed for filing, on behalf of Lime Rock Resources A, L.P., is Lime Rock's Pre-Hearing Statement regarding the Hearing called by the Oil Conservation Division for the purpose of considering Lime Rock Resources A, L.P.'s application for compulsory pooling and non-standard spacing and proration unit.

Thank you.

Lawrence D. Garcia

Attorney for Lime Rock Resources A, L.P.

cc: Lime Rock Resources A, L.P.

Attn: Charles Reagan

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

IN THE MATTER OF THE APPLICATION OF LIME ROCK RESOURCES A, L.P. FOR COMPULSORY POOLING AND NON-STANDARD SPACING AND PRORATION UNIT, EDDY COUNTY, NEW MEXICO.

**CASE NO. 14630** 

### PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Lime Rock Resources A, L.P. by and through its undersigned counsel, Lawrence Garcia, as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

**APPLICANT** 

Lime Rock Resources A, L.P. Attn: Chuck L. Reagan 1111 Bagby St., Suite 4600 Houston, TX 77002 713-292-9510 **ATTORNEY** 

Lawrence D. Garcia, Esq. 1502 Dodd Lane Houston, TX 77077 713-598-4668 RECEIVED OCD

#### **OPPOSITION OR OTHER PARTY:**

Unknown

#### STATEMENT OF CASE

Applicant seeks an order pooling all mineral interests from the surface of the earth to test the Cherry Canyon formation underlying the S/2SW/4 of Section 10, Township 25 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. Applicant proposes to horizontally drill its Shrike 10 State Well No. 2 H to be located at a surface location of 400 FSL and 2590 FWL and bottom hole location of 400 FSL and 330 FWL of said Section 10. Applicant seeks to dedicate the S/2SW/4 of Section 10 to the well to form a non-standard 80 acres spacing and proration unit for any formations and/or pools developed on 80 acres or less within the vertical extent, including the Cherry Canyon formation. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for

supervision, designation of Lime Rock Resources A, L.P., as operator of the well and a charge for risk involved in drilling said well.

# **OPPOSITION OR OTHER PARTY:**

Unknown

# PROPOSED EVIDENCE

# **APPLICANT:**

WITNESSES	EST. TIME	EXHIBITS
Chuck L. Reagan, Landman	30 minutes	#1 Land Plat #2 List of working interest owners #3 Summary of
Richard Ghiselin Petroleum Engineer	30 minutes	Contact/Responses #4 Area Production Plat #5 Type Log #6 C-102 #7 Directional drilling plan
Lawrence D. Garcia		#8 AFE #9 Affidavit of Service

# **OPPOSITION:**

Unknown

# PROCEDURAL MATTERS

Lime Rock Resources A, L.P. has none at this time.

Lawrence D. Garcia

Attorney for Lime Rock Resources A, L.P.