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

APPLICATION OF ONEENERGY PARTNERS OPERATING, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING. LEA COUNTY, NEW MEXICO.

APPLICATION OF ONEENERGY PARTNERS OPERATING, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

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CASE NOS. 15758 and 15759

#### PRE-HEARING STATEMENT

OneEnergy Partners Operating, LLC, the applicant in the above-referenced matters, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

#### **APPEARANCES**

#### **APPLICANT**

OneEnergy Partners Operating, LLC 2929 Allen Parkway, Suite 200 Houston, Texas 77019

#### **ATTORNEY**

Michael H. Feldewert, Esq. Jordan L. Kessler, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile

## INTERESTED PARTY

V-F Petroleum, Inc., Gahr Energy Company, James Bruce, Esq. Ameristate Patners LLC, Ameristate Energy PO Box 1056 LLC, HFLP E&P LLC, Thomas M. Beall, Santa Fe, New Mexico 87504 Jerry M. Gahr, Marcus Wayne Luna, Sandra K. (505) 982-2043 Lawlis, Clifford N. Hair, and Mark K. Nearburg

## **ATTORNEY**

#### APPLICANT'S STATEMENT OF CASE

In Case No. 15758, OneEnergy Partners Operating, LLC (OGRID 372031) seeks an order (1) creating a 322.42-acre spacing and proration unit comprised of the W/2 W/2 of Section 1 and the W/2 W/2 of Section 12, Township 22 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Bone Spring formation underlying this acreage. The Unit will be the project area for the proposed **Lobo Rojo B3 State Com No. 1H**Well, which will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 12 to a standard bottom hole location in the NW/4 NW/4 (Unit D) of Section 1. The completed interval for this well will remain within the 330-foot standard offset required by the Statewide Rules set forth in 18.15.15 NMAC.

In Case No. 15758, OneEnergy Partners Operating, LLC seeks an order (1) creating a 322.49-acre spacing and proration unit comprised of the E/2 W/2 of Section 1 and the E/2 W/2 of Section 12, Township 22 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Bone Spring formation underlying this acreage. The Unit will be the project area for the proposed **Lobo Rojo B3 State Com No. 2H Well,** which will be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 12 to a standard bottom hole location in the NE/4 NW/4 (Unit C) of Section 1. The completed interval for this well will remain within the 330-foot standard offset required by the Statewide Rules set forth in 18.15.15 NMAC.

OneEnergy Partners Operating, LLC contends that granting these two applications will prevent waste due to greater economic and engineering efficiencies and higher EURs.

## APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Jeff Lierly—VP of Land	Approx. 10	Approx. 6
Greg Clark - Contract Geologist	Approx. 10	Approx. 4
David Ramsden-Wood, Petroleum Engineer	Approx. 10	Approx. 4

# PROCEDURAL MATTERS

OneEnergy Partners Operating, LLC respectfully requests that Case Nos. 15758 and 15759 be consolidated for hearing.

Respectfully submitted,

HOLLAND & HART LLP

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ATTORNEYS FOR ONEENERGY PARTNERS OPERATING, LLC

# **CERTIFICATE OF SERVICE**

I hereby certify that on August 10, 2017, I served a copy of the foregoing document to the following counsel of record via electronic mail:

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