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 FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 16037

PRE-HEARING STATEMENT

Advance Energy Partners Hat Mesa, LLC, ("Advance Energy Partners"), provisionally provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

ADVANCE ENERGY PARTNERS HAT

MESA, LLC

ADVANCE ENERGY PARTNERS HAT

MESA, LLC 's ATTORNEY

J. Scott Hall, Esq.

MONTGOMERY & ANDREWS, P.A.

P.O. Box 2307

Santa Fe, NM 87504-2307

Tele (505) 982-3873 shall@montand.com

<u>APPLICANT</u>

APPLICANT'S ATTORNEY

ONEENERGY PARTNERS

OPERATING, LLC

Michael H. Feldewert Adam G. Rankin Holland & Hart LLP Post Office Box 2208 Santa Fe, NM 87504-2208 mfeldewert@hollandhart.com

agrankin@hollandhart.com

STATEMENT OF THE CASE

Applicant OneEnergy Partners Operating, LLC seeks an order (1) creating a 320.91-acre, more or less, non-standard spacing and proration unit comprised of the W/2 W/2 of Section 2,

and the W/2 W/2 of Section 11, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the Wolfcamp formation. Advance Energy Partners is the owner of lease interests within the proposed unit.

PROPOSED EVIDENCE

<u>OPPONENT</u>: ADVANCE ENERGY PARTNERS HAT <u>EST. TIME</u> <u>EXHIBITS</u> MESA, LLC

WITNESSES:

None at this time. However, Advance Energy Partners Hat Mesa, LLC reserves the right to cross-examine OneEnergy Partners Operating, LLC's witnesses and produce its own witnesses for direct examination.

<u>APPLICANT</u>: ONEENERGY PARTNERS OPERATING, <u>EST. TIME</u> <u>EXHIBITS</u> LLC

WITNESSES:

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: 1. Scott Hall

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

shall@montand.com

Attorneys for Advance Energy Partners Hat Mesa, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on March 29, 2018:

Michael H. Feldewert Adam G. Rankin Holland & Hart LLP Post Office Box 2208 Santa Fe, NM 87504-2208 mfeldewert@hollandhart.com agrankin@hollandhart.com

Attorneys for OneEnergy Partners Operating, LLC

J. Scott Hall

7. 1 way 44 4