

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

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF ASCENT ENERGY, LLC  
FOR COMPULSORY POOLING, EDDY COUNTY,  
NEW MEXICO.**

**Case No. 16481**

**APPLICATION OF ASCENT ENERGY, LLC  
FOR COMPULSORY POOLING, EDDY COUNTY,  
NEW MEXICO.**

**Case No. 16482**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Ascent Energy, LLC (“applicant” or “Ascent”) as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Ascent Energy, LLC  
Attention: Lee Zink

**APPLICANT’S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

Apache Corporation

**OPPONENT’S ATTORNEY**

Jennifer L. Bradfute  
Earl deBrine

**STATEMENT OF THE CASES**

**APPLICANT**

**Case No. 16481:** Applicant seeks an order pooling all mineral interests in the Bone Spring formation underlying a 320-acre horizontal spacing unit in the Bone Spring formation comprised of the W/2W/2 of Section 28 and the W/2W/2 of Section 33, Township 20 South, Range 30 East, NMPM. The unit will be dedicated to the Anvil Fed. Com. Well No. 401H, Anvil Fed. Com. Well No. 501H, and Anvil Fed. Com. Well No. 601H, horizontal Bone Spring wells with first

take points in the SW/4SW/4 of Section 33 and final take points in the NW/4NW/4 of Section 28.

**Case No. 16482:** Applicant seeks an order pooling all mineral interests in the Wolfcamp formation underlying a 320-acre horizontal spacing unit in the Wolfcamp formation comprised of the W/2W/2 of Section 28 and the W/2W/2 of Section 33, Township 20 South, Range 30 East, NMPM. The unit will be dedicated to the Anvil Fed. Com. Well No. 701H and Anvil Fed. Com. Well No. 702H, horizontal Wolfcamp wells with first take points in the SW/4SW/4 of Section 33 and final take points in the NW/4NW/4 of Section 28.

Also to be considered in each case will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

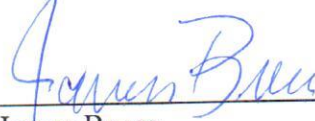
<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Lee Zink (landman)	20 min.	Approx. 10
Matt Ward (geologist)	25 min.	Approx. 10
Alex Yancey (engineer)	20 min.	Approx. 5

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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**PROCEDURAL MATTERS**

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

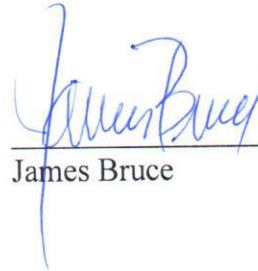
Attorney for Ascent Energy, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 3rd day of ~~October~~ January, 2018 via e-mail:

Jennifer L. Bradfute  
[jlb@modrall.com](mailto:jlb@modrall.com)

Earl deBrine  
[edebrine@modrall.com](mailto:edebrine@modrall.com)



James Bruce