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

APPLICATION OF LIME ROCK RESOURCES II-A, L.P. FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

**CASE NO. 21049** 

## APPLICANT'S PRE- HEARING STATEMENT

Lime Rock Resources II-A, L.P. ("LRR" or "Applicant") (OGRID No. 277558) submits this pre-hearing statement as required by the rules of the Oil Conservation Division.

## **APPEARANCES**

#### APPLICANT

#### **ATTORNEY**

Lime Rock Resources II-A, L.P.

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421 (505) 983-6043 Facsimile

#### APPLICANT'S STATEMENT OF THE CASE

Applicant seeks an order pooling all uncommitted interests in the Yeso formation [Red Lake; Glorieta-Yeso, Northeast (Pool Code 96836)] underlying a standard 160-acre horizontal spacing unit comprised of the N/2 S/2 of Section 27, Township 17 South, Range 27 East, NMPM, Eddy County, New Mexico. Applicant intends to initially dedicate this horizontal spacing unit to the proposed **Eagle 27 Federal Com 1H**, which will be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 26 to a bottom-hole location in the NW/4 SW/4 (Unit L) of Section 27.

## PROPOSED EVIDENCE

WITNESSES	
Name and Expertise	

#### **ESTIMATED TIME**

**EXHIBITS** 

Doug Lacey, Landman

10 minutes

Approx. 8

Stan Bishop, Geologist

Affidavit

4

Frank Falleri, Production Manager

10 minutes (as necessary)

None at this time

# PROCEDURAL MATTERS

Applicant does not expect any opposition to this pooling application and therefore intends to present at least a portion of this case by affidavit.

Respectfully submitted,

**HOLLAND & HART LLP** 

Michael II E

Michael H. Feldewert Adam G. Rankin

Julia Broggi

Kaitlyn A. Luck

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

agrankin@hollandhart.com

jbroggi@hollandhart.com

kaluck@hollandhart.com

ATTORNEYS FOR LIME ROCK RESOURCES