# 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. 21050** 

#### 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 (Pool Code 51120)] underlying a standard 160-acre horizontal spacing unit comprised of the N/2 N/2 of Section 9, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Applicant intends to initially dedicate this horizontal spacing unit to the proposed **Hawk 9 Federal Com 1H** and **Hawk 9 Federal Com 2H** wells, which will be horizontally drilled from a common surface location in the NE/4 NE/4 (Unit A) of Section 8 to bottom-hole locations in the NE/4 NE/4 (Unit A) of Section 9.

Due to the recent results of nearby wells, the proposed depth of the **Hawk 9 Federal Com**1H has been deepened so that both wells are now proposed to be drilled at an approximate TVD of 3580 feet.

## 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 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

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 30, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Andrew J. Cloutier
HINKLE SHANOR LLP
P.O. Box 10
Roswell, New Mexico 88202-0010
575-622-6510
575-623-9332 Facsimile
acloutier@hinklelawfirm.com

Attorney for XTO Energy Inc.

Michael H. Feldewert