

**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. 21048

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

Lime Rock Resources II-A, L.P.

ATTORNEY

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

Applicants seeks an order pooling all uncommitted interests in the Yeso formation [Red Lake; Glorieta-Yeso (Pool Code 51120)] underlying a standard 200-acre horizontal spacing unit comprised of the N/2 N/2 of Section 8 and the NE/4 NE/4 of Section 7 in Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Applicant intends to initially dedicate this horizontal spacing unit to the **Condor 8 Federal Com 3H** and **Condor 8 Federal Com 4H** wells, each of which will be horizontally drilled from a common surface location in the NW/4 NW/4

(Unit D) of Section 9 to bottom-hole locations in the NE/4 NE/4 (Unit A) of Section 7. Due to the recent results of nearby wells, the proposed depth of the **Condor 8 Federal Com 3H** has been deepened so that both wells are now proposed to be drilled at an approximate TVD of 3580 feet.

An ownership depth severance exists at 3,000 feet underlying the N/2 NE/4 and the NE/4 NW/4 of Section 8, with Applicant owning 100% of the mineral interest above the depth severance line and ZPZ Delaware owning 100% of the mineral interest below the depth severance line.

PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Doug Lacey, Landman	Affidavit	6
Stan Bishop, Geologist	Affidavit	3

PROCEDURAL MATTERS

Applicant does not expect any opposition to this pooling application and therefore intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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 II-A,
L.P.**