

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

**APPLICATION OF RIDGE RUNNER  
RESOURCES OPERATING, LLC  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**Case No. 21478**

**RIDGE RUNNER RESOURCES OPERATING, LLC'S  
PRE-HEARING STATEMENT**

Ridge Runner Resources Operating, LLC ("Ridge Runner") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Ridge Runner Resources Operating, LLC

**APPLICANT'S ATTORNEYS**

Dana S. Hardy  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
Phone: (505) 982-4554  
Facsimile: (505) 982-8623  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)

**INTERESTED PARTY**

XTO Energy, Inc.

**INTERESTED PARTY'S ATTORNEYS**

Michael H. Feldewert  
Adam G. Rankin  
Kaitlyn A. Luck  
P.O. Box 2208  
Santa Fe, NM 87504-2208  
Phone: (505) 988-4421  
Facsimile: (505) 983-6043  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

### **STATEMENT OF THE CASE**

Ridge Runner seeks an order pooling all uncommitted mineral interests in the Wolfcamp formation in a standard proximity tract 480-acre horizontal spacing unit comprised of the SW/4 of Section 3 and the W/2 of Section 10, Township 20 South, Range 35 East in Lea County. The horizontal spacing unit will be dedicated to the following wells: (1) Thunderbird 3-10 Fed Com W #1H, which will be drilled from a surface location in Unit L in Section 3 to a bottom hole location in Unit M in Section 10; and (2) Thunderbird 3-10 Fed Com W #2H, which will be drilled from a surface location in Unit L in Section 3 to a bottom hole location in Unit N in Section 10. The completed intervals of the wells will be orthodox. Also to be considered will be the costs of drilling and completing the wells and the allocation of the costs, the designation of Ridge Runner as the operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The granting of Ridge Runner's application will protect correlative rights and prevent waste.

### **PROPOSED EVIDENCE**

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBIT</u>
Robert Shelton (Landman)	10 minutes	Approximately 12
Michael Burke (Geologist)	15 minutes	Approximately 5

Ridge Runner reserves its right to call a rebuttal witness(es) if appropriate.

### **PROCEDURAL MATTERS**

Ridge Runner is not aware of any procedural matters to be resolved prior to the hearing. If there is no opposition to its application, Ridge Runner will present its case by affidavit.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

Dana S. Hardy

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)

*Counsel for Ridge Runner Resources Operating,  
LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of November 2020, I sent a true and correct copy of Ridge Runner Resources, Operating LLC's Pre-Hearing Statement via email to:

Michael H. Feldewert

Adam G. Rankin

Kaitlyn A. Luck

P.O. Box 2208

Santa Fe, NM 87504-2208

Phone: (505) 988-4421

Facsimile: (505) 983-6043

[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

[agrankin@hollandhart.com](mailto:agrankin@hollandhart.com)

[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

*Attorneys for XTO Energy, Inc.*

/s/ Dana S. Hardy