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 JTD RESOURCES, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 14,702

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT JTD Resources, LLC P.O. Box 3422 Midland, Texas 79702 APPLICANT'S ATTORNEY James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attention: Dan Leonard (432) 682-3712

<u>OPPONENT</u>

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interests from the surface to the base of the Abo formation underlying the NE/4SW/4 of Section 4, Township 20 South, Range 38 East, NMPM, to form a standard 40-acre oil spacing and proration unit for any and all formations or pools developed on 40-acre spacing within that vertical extent. The unit is to be dedicated to the Collins Heirs Well No. 1, to be located at an orthodox location in the NE/4SW/4 of Section 4. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of Primero Operating, Inc. as operator of the well, and a 200% charge for the risk involved in drilling and completing the well. **OPPONENT**

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PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>

EST. TIME

EXHIBITS

Dan Leonard (landman) 15 min.

Approx. 5

IF THIS MATTER IS UNOPPOSED IT WILL BE SUBMITTED BY AFFIDAVIT.

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

-None-

Respectfully submitted,

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

Attorney for JTD Resources, LLC