

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

**APPLICATION OF SPUR ENERGY  
PARTNERS, LLC FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.**

**CASE NOS. 21586 & 21587**

**SPUR ENERGY PARTNERS, LLC'S CONSOLIDATED PRE-HEARING STATEMENT**

Spur Energy Partners, LLC ("Spur") (OGRID No. 328947), the applicant in the above-referenced case, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Spur Energy Partners, LLC

**ATTORNEY**

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**APPLICANT'S STATEMENT OF CASE**

In **Case No. 21586**, Spur seeks an order pooling all uncommitted interests in a portion of the Yeso formation [Red Lake, Glorieta-Yeso (51120)], from the top of the Yeso formation to a depth of 3,000 feet, in the 160-acre horizontal spacing comprised of the N/2 S/2 of Section 18, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Spur seeks to dedicate this spacing unit to the proposed initial **Smashing Pumpkins #1H well** (API No.

30-15-pending), to be drilled from a surface location in the NE/4 SE/4 (Unit I) of Section 13 to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 18. The completed interval for each well will comply with Statewide rules for oil wells. A depth severance exists in the Yeso formation within the proposed the horizontal spacing unit. Spur seeks to pool only a portion of the Yeso formation, from the top of the Yeso formation to a depth of 3,000 feet, as defined in the Misc. 127/584 Pooling Agreement for the S/2 of Section 18, dated January 21, 1975, and in the Gamma Ray-Neutron Log of the Feathers Comm No. 1H Well (API No. 30-015-21356).

In **Case No. 21587**, Spur seeks an order pooling all uncommitted interests in a portion of the Yeso formation [Red Lake, Glorieta-Yeso (51120)], from a depth of 3,001 feet to the base of the Yeso formation, in the 160-acre horizontal spacing comprised of the N/2 S/2 of Section 18, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Spur seeks to dedicate this spacing unit to these proposed initial wells: (1) the **Smashing Pumpkins #10H well** (API No. 30-15-pending), (2) the **Smashing Pumpkins #50H well** (API No. 30-15-pending), and (3) the **Smashing Pumpkins #70H well** (API No. 30-15-pending), to be drilled from a common surface location in the NE/4 SE/4 (Unit I) of Section 13 to bottom hole locations in the NE/4 SE/4 (Unit I) of Section 18. The completed interval for each well will comply with Statewide rules for oil wells. A depth severance exists in the Yeso formation within the proposed the horizontal spacing unit. As such, Spur seeks to pool only a portion of the Yeso formation, from a depth of 3,001 feet, to the base of the Yeso formation, as defined in the Misc. 127/584 Pooling Agreement for the S/2 of Section 18, dated January 21, 1975, and in the Gamma Ray-Neutron Log of the Feathers Comm No. 1H Well (API No. 30-015-21356).

**APPLICANT'S PROPOSED EVIDENCE**

<b><u>WITNESS</u></b> <b>Name and Expertise</b>	<b><u>ESTIMATED TIME</u></b>	<b><u>EXHIBITS</u></b>
Megan Peña, Landman	Affidavit	Approx. 4
C.J. Lipinski, Geologist	Affidavit	Approx. 4

**PROCEDURAL MATTERS**

If uncontested at the time of hearing, Spur intends to present these consolidated cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



By: \_\_\_\_\_

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