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April 15, 2014

VIA FACSIMILE & FEDERAL EXPRESS
(505) 476-3462

Ms. Florene Davidson
Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

**RE: Texland Petroleum, L.P.
Cause No. 15111**

Dear Ms. Davidson:

Enclosed please find Texland Petroleum L.P.'s Pre-Hearing Statement. The original and one copy of the Statement with Exhibits will follow by Federal Express. Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

CARSON RYAN LLC



Elizabeth A. Ryan

BAR/rmt
Enclosures

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

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**APPLICATION OF TEXLAND PETROLEUM, L.P.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

Case No. 15,111

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Texland Petroleum, L.P.
777 Main Street, Ste. 3200
Fort Worth, Texas 76102

Attention: Wilson Woods
(817) 900-1216

APPLICANT'S ATTORNEY

Elizabeth A. Ryan
CARSON RYAN LLC
P.O. Box 1612
Roswell, New Mexico 88202
(575) 291-7606
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OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Texland Petroleum, L.P. seeks an order pooling the mineral interests of Mrs. Catherine Prichard Kaplan, as sole heir of the Estates of John F. Prichard and wife, Edna C. Prichard, both deceased, and as Trustee of the Family Trust of Dr. and Mrs. John F. Prichard in the Shipp Strawn formation underlying an 80 acre spacing unit comprising of the N/2SW/4 of Section 3, Township 17 South, 37 East, N.M.P.M., Lea County, New Mexico. The unit is to be dedicated to applicant's Simmon's Estate #2 Well, to be vertically drilled from wellbore in N/2SW/4 of Section 3 to the Shipp Strawn formation at the non-standard unorthodox location of the 1650 feet FSL and 970 feet SWL in the Unit L Section 3. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs thereof, as well as actual

operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for risk involved in the drilling the well.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|--|------------------|-----------------|
| Wilson Woods (Land Manager and Counselor) | 15 min. | Approx. 6 |
| Bryan E. Lee (Vice-President - Exploration) | 15 min. | Approx. 1 |

APPLICANT REQUESTS PERMISSION TO PRESENT GEOLOGIC TESTIMONY BY AFFIDAVIT, BUT WILL HAVE THE WITNESS AVAILABLE BY TELEPHONE TO ANSWER QUESTIONS.

OPPONENT

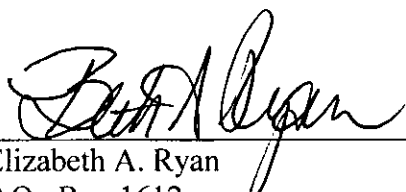
| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
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PROCEDURAL MATTERS

-None-

Respectfully submitted,

CARSON RYAN LLC


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Attorneys for Texland Petroleum, L.P.