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

APPLICATION OF RKI EXPLORATION AND PRODUCTION FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 15477

RKI'S PRE-HEARING STATEMENT

RKI Exploration and Production, the applicant in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT	<u>ATTORNEY</u>	
RKI Exploration and Production 210 Park Avenue Suite 700 Oklahoma City, OK 73102	Michael H. Feldewert, Esq. Jordan L. Kessler, Esq. Holland & Hart, LLP	RECEIVED OOD

APPLICANT'S STATEMENT OF CASE

RKI Exploration and Production ("RKI") seeks an order (1) creating a 160-acre, more or less, non-standard spacing and proration unit comprised of the E/2 E/2 of Section 17, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico; and (2) pooling all mineral interests in the Wolfcamp formation. Said non-standard unit is to be dedicated to applicant's proposed RDX Federal Com 17 No. 40H Well, which will be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) to a standard bottom hole location in the SE/4 SE/4 (Unit P) of Section 17. The completed interval for this well will comply with the Division's setback requirements.

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APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Cameron Enteshary (Landman)	Approx. 10	Approx. 5
Cody Buller (Geologist)	Approx. 10	Approx. 5

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP

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