STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT (1) OIL CONSERVATION DIVISION

2016 JUL 28 P 12: 49

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF NEMO FUND 1, LLC FOR APPROVAL OF A UNIT AGREEMENT, LEA COUNTY, NEW MEXICO.

Case No. 15,522

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT'S ATTORNEY

Nemo Fund I, LLC James Bruce 5826 New Territory P.O. Box 1056

Box 412 Santa Fe, New Mexico 87504

Sugarland, TX 77479 (505) 982-2043

Attention: Bo Blue

(713) 899-3511

<u>OPPONENT'S ATTORNEY</u>

STATEMENT OF THE CASE

APPLICANT

Applicant seeks approval of the Unit Agreement for the Larry San Andres Unit Area, comprising 5594.98 acres of state and fee lands comprising all or portions of Sections 4, 6-9, 17-19, and 30, Township 10 South, Range 37 East, NMPM.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBITS</u>

Bo Blue 15 Min. Approx. 4

(landman) Approx. 4

Steven Gohlke 15 Min. Approx. 3 (geologist)

<u>OPPONENT</u>

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBITS</u>

PROCEDURAL MATTERS

-None-

Respectfully submitted,

James Bruce

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Attorney for Nemo Fund I, LLC