

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

**APPLICATION OF ROCKCLIFF OPERATING
NEW MEXICO LLC FOR APPROVAL OF THE
BUTTON MESA SAN ANDRES STATE
EXPLORATORY UNIT, CHAVES AND LEA
COUNTIES, NEW MEXICO**

Case No. 15587

**ROCKCLIFF OPERATING NEW MEXICO LLC'S
AMENDED PRE-HEARING STATEMENT**

Rockcliff Operating New Mexico LLC ("Rockcliff") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

Rockcliff is the applicant in this case. Its business address is 1301 McKinney Street, Suite 1300, Houston, Texas 77010. Rockcliff is represented by the undersigned counsel.

STATEMENT OF THE CASE

Rockcliff's application seeks an order approving its Button Mesa San Andres State Exploratory Unit, which is comprised of 9,602.72 acres, more or less, of State of New Mexico lands situated in all or parts of Chaves and Lea Counties, described as follows:

Township 8 South, Range 32 East, N.M.P.M., Chaves County

Section 14: ALL
Section 15: ALL
Section 21: E½
Section 22: ALL
Section 23: ALL
Section 26: ALL
Section 27: ALL
Section 28: ALL
Section 29: E½
Section 32: ALL
Section 33: ALL
Section 34: ALL
Section 35: ALL

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Township 9 South, Range 32 East, N.M.P.M., Lea County

Section 3: ALL
Section 4: ALL
Section 9: N½
Section 10: N½

The unitized interval is the San Andres formation, defined as the stratigraphic equivalent of the interval between 3,397 feet to 4,807 feet as depicted on the Spatial Density – Dual Spaced Neutron log dated June 3, 1995, for the Apache Corporation State 28 – 1 well (API No. 30-005-21136) located in Section 28, Township 8, Range 32 East, in Chaves County.

PROPOSED EVIDENCE

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Mark Holt (Landman)	10 minutes	Approx. 7
Nolan Shaw (Geologist)	10 minutes	Approx. 3

Rockcliff reserves the right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

Rockcliff is not aware of any procedural matters to be resolved prior to the hearing.

HINKLE SHANOR, LLP


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