

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

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APPLICATION OF BC OPERATING INC.,  
CROWN OIL PARTNERS V, CRUMP ENERGY  
PARTNERS, AND NADEL AND GUSSMAN  
PERMIAN, LLC FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.

CASE NO. 15661

**S. K. WARREN RESOURCES, LLC'S PRE-HEARING STATEMENT**

S.K. Warren Resources, LLC ("S.K. Warren"), submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

BC Operating, Crown Oil Partners V,  
Crump Energy Partners, and  
Nadel and Gussman Permian, LLC  
P.O. Box 50820  
Midland, TX 79710

**ATTORNEY**

Michael H. Feldewert  
Jordan L. Kessler  
Holland & Hart, LLP  
P.O. Box 2208  
Santa Fe, NM 87504-2208

**OPPONENT:**

S.K. Warren Resources, LLC  
P.O. Box 470372  
Tulsa, OK 74147-0372

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Jennifer L. Bradfute, Esq.  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
P. O. Box 2168  
Albuquerque, New Mexico 87103-2168  
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**STATEMENT OF CASE**

Applicants BC Operating, Crown Oil Partners V, Crump Energy Partners, and Nadel and Gussman Permian, LLC seek an order pooling all uncommitted interests in the Wolfcamp formation underlying the 320-acre, more or less, spacing and proration unit comprised of the E/2 of Section 22, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.

**OPPONENT:**

S.K. Warren Resources objects to this application on the grounds that Applicants failed to engage in good faith efforts to reach a voluntary agreement with S.K. Warren Resources prior to filing their pooling application with the Division. S.K. Warren Resources may also oppose the risk penalty and overhead expenses sought by Applicants for this project.

**PROPOSED EVIDENCE**

**OPPONENT:**

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Stephen K. Warren, Owner and expert in land issues	Approx. 15	5

Respectfully submitted,

**MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.**

By:   
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**Attorneys for S.K. Warren Resources, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on March 23, 2017.

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