

2018 JAN 18 P 3: 05

6/13/2018

## **EXHIBIT A**

Tim S. Cashon  
4239 Bowser Ave  
Dallas, TX 75219

ALLENCRESTNM I  
c/o Mark Stanger  
5151 Beltline Rd, Ste 360  
Dallas, TX 75254

John Delaney  
581 Sarepta Lane NW  
Meadville, MS 39653

Wayne Newkumet  
P. O. Box 11330  
Midland, TX 79702

James E. Brown  
62 Fafu Oaks Estates  
Fletcher, NC 28732

Brent D. Hilliard  
4800 Island Dr.  
Midland, TX 79707

Wendell R. Creech  
6516 Dahlia Ave.  
Midland, TX 79707

David F. Alderks  
4404 Pasadena  
Midland, TX 79703

7015 1730 0000 9833 6106

# U.S. Postal Service™ CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Certified Mail Fee

Extra Services & Fees (check box, add fee as applicable)

<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage

Total Postage and Fees

Wayne Newkumet  
P. O. Box 11330  
Midland, TX 79

SANTA FE NM  
Postmark  
Here  
JUL 1 2017  
USPO 87504

PS Form 3800, April 2015 PSN 7530-02-000-9007 See Reverse for Instructions

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Wayne Newkumet  
P. O. Box 11330  
Midland, TX 79

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

*[Signature]*

☐ Agent  
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

11/8/18

3. Service Type

<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Priority Mail Express™
<input type="checkbox"/> Registered	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes

7015 1730 0000 9833 6106

PS Form 3811, July 2013

Domestic Return Receipt

EXHIBIT A



**MONTGOMERY  
& ANDREWS**  
LAW FIRM

J. SCOTT HALL  
Cell: (505) 670-7362  
Email: [shall@montand.com](mailto:shall@montand.com)  
[www.montand.com](http://www.montand.com)

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December 21, 2017

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**TO: ALL OVERRIDING ROYALTY INTEREST OWNERS ON ATTACHED LIST**

**Re: Case No. 15875: Application of Great Western Drilling Ltd. for a Non-Standard Oil Spacing and Proration Unit and Compulsory Pooling, Lea County, New Mexico.**

Dear Sir or Madam:

This will advise that Great Western Drilling Ltd. has filed an Application seeking an order approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the W/2W/2 of Section 34, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the Bone Spring formation underlying the non-standard unit. The unit will be dedicated to Applicant's proposed **Grama Ridge East 34 State 3BS #2H** well to be drilled from an orthodox location approximately 275 feet from the north line and 870 feet from the west line (surface) of Section 34, Township 21 South, Range 34 East, to a landing point approximately 330 feet from the north line and 460 feet from the west line of Section 34, Township 21 South, Range 34 East, and then to a bottom hole location approximately 330 feet from the south line and 460 feet from the west line (terminus) of Section 34, Township 21 South, Range 34 East. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and lands are located approximately 20 miles west of Eunice, New Mexico.

A copy of the Application for hearing is enclosed.

This Application has been set for a continued hearing before a Division Examiner on January 11, 2018, at 8:15 a.m. at the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico. You are not required to attend this hearing, but as an owner of an interest that may be affected, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging this application at a later time. If you intend to attend the hearing and present testimony or evidence, you must enter your appearance and serve the Division, counsel for the Applicant and other

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**REPLY TO:**


325 Paseo de Peralta  
Santa Fe, New Mexico 87501  
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307  
Santa Fe, New Mexico 87504-2307

All ORRs  
December 21, 2017  
Page 2

parties with a pre-hearing statement at least four business days before the scheduled hearing date in accordance with Division Rule 19.15.4.13.

Very truly yours,



J. Scott Hall  
Seth C. McMillan

SCM:do  
Enclosure

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Midland, TX 79707

David F. Alderks  
4404 Pasadena  
Midland, TX 79703

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2017 OCT 31 P 4:11

**BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION**

**APPLICATION OF GREAT WESTERN DRILLING LTD.  
FOR A NON-STANDARD OIL SPACING AND  
PRORATION UNIT AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

Case No. 15875

**APPLICATION**

Great Western Drilling Ltd. applies for an order approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the W/2W/2 of Section 34, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the Bone Spring formation underlying the non-standard unit, and in support thereof, states:

1. Applicant is an interest owner in the W/2W/2 of Section 34, and has the right to drill a well thereon.
2. Applicant proposes to drill its Grama Ridge East 34 State 3BS #2H well to a depth sufficient to test the Bone Spring formation. Applicant seeks to dedicate the W/2W/2 of Section 34 to the well to form a non-standard 160-acre oil spacing and proration unit (project area) in the Bone Spring formation. The well is a 4630' horizontal well, with a surface location 275 feet from the north line and 870 feet from the west line of Section 34, a landing point 330 feet from the north line and 460 feet from the west line of Section 34, and a bottom hole location 330 feet from the south line and 460 feet from the west line of Section 34.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the Bone Spring formation in the W/2W/2 of Section 34 for the purposes set forth herein.
4. Although Applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their interests.

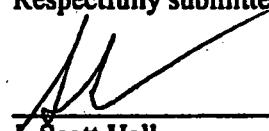
Therefore, applicant seeks an order pooling all mineral interest owners in the Bone Spring formation in the W/2W/2 of Section 34, pursuant to NMSA 1978, §§ 70-2-17, -18.

5. Approval of the non-standard unit and the pooling of all mineral interests in the Bone Spring formation underlying the W/2W/2 of Section 34 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, Applicant requests that, following notice and a hearing to be set for November 30, 2017, the Division enter its order:

- A. Approving a non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the W/2W/2 of Section 34;
- B. Pooling all mineral interests in the Bone Spring formation underlying the W/2W/2 of Section 34;
- C. Designating Applicant as operator of the well;
- D. Considering the cost of drilling and completing the well, and allocating the cost among the well's working interest owners;
- E. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- F. Setting a 200% charge for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,

  
\_\_\_\_\_  
J. Scott Hall  
Seth C. McMillan  
Post Office Box 2307  
Santa Fe, NM 87504-2307  
(505) 982-3873  
*Attorneys for Great Western Drilling Ltd.*



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**Case No. 15875 Application of Great Western Drilling Ltd. for a Non-Standard Oil Spacing and Proration Unit and Compulsory Pooling, Lea County, New Mexico.** Applicant seeks an order approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the W/2W/2 of Section 34, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the Bone Spring formation underlying the non-standard unit. The unit will be dedicated to Applicant's proposed Grama Ridge East 34 State 2BS #2H well to be drilled from an orthodox location approximately 275 feet from the north line and 870 feet from the west line (surface) of Section 34, Township 21 South, Range 34 East, to a landing point approximately 330 feet from the north line and 460 feet from the west line of Section 34, Township 21 South, Range 34 East, and then to a bottom hole location approximately 330 feet from the south line and 460 feet from the west line (terminus) of Section 34, Township 21 South, Range 34 East. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and lands are located approximately 20 miles west of Eunice, New Mexico.

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December 21, 2017

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**TO: ALL OVERRIDING ROYALTY INTEREST OWNERS ON ATTACHED LIST**

**Re: Case No. 15876 (re-advertised): Application of Great Western Drilling Ltd. for a Non-Standard Oil Spacing and Proration Unit and Compulsory Pooling, Lea County, New Mexico.**

Dear Sir or Madam:

This will advise that Great Western Drilling Ltd. has filed an Application seeking an order approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the E/2E/2 of Section 34, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the Bone Spring formation underlying the non-standard unit. The unit will be dedicated to Applicant's proposed **Grama Ridge East 34 State 2BS #9H** well to be drilled from an orthodox location approximately 275 feet from the south line and 1220 feet from the east line (surface) of Section 34, Township 21 South, Range 34 East, to a landing point approximately 330 feet from the south line and 460 feet from the east line of Section 34, Township 21 South, Range 34 East, and then to a bottom hole location approximately 330 feet from the north line and 460 feet from the east line (terminus) of Section 34, Township 21 South, Range 34 East. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and lands are located approximately 20 miles west of Eunice, New Mexico.

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325 Paseo de Peralta  
Santa Fe, New Mexico 87501  
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Santa Fe, New Mexico 87504-2307

All ORRIs  
December 21, 2017  
Page 2

parties with a pre-hearing statement at least four business days before the scheduled hearing date in accordance with Division Rule 19.15.4.13.

Very truly yours,

A handwritten signature in black ink, appearing to be 'J. Scott Hall', written over a horizontal line.

J. Scott Hall  
Seth C. McMillan

SCM:do  
Enclosure

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Wendell R. Creech  
6516 Dahlia Ave.  
Midland, TX 79707

David F. Alderks  
4404 Pasadena  
Midland, TX 79703

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2017 NOV -9 P 3: 54

**BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION**

**APPLICATION OF GREAT WESTERN DRILLING LTD.  
FOR A NON-STANDARD OIL SPACING AND  
PRORATION UNIT AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**Case No. 15876**

**AMENDED APPLICATION**

Great Western Drilling Ltd. applies for an order approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the E/2E/2 of Section 34, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the Bone Spring formation underlying the non-standard unit, and in support thereof, states:

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2. Applicant proposes to drill its Grama Ridge East 34 State 2BS #9H well to a depth sufficient to test the Bone Spring formation. Applicant seeks to dedicate the E/2E/2 of Section 34 to the well to form a non-standard 160-acre oil spacing and proration unit (project area) in the Bone Spring formation. The well is a 4624' horizontal well, with a surface location 275 feet from the south line and 1220 feet from the east line of Section 34, a landing point 330 feet from the south line and 460 feet from the east line of Section 34, and a bottom hole location 330 feet from the north line and 460 feet from the east line of Section 34.

3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the Bone Spring formation in the E/2E/2 of Section 34 for the purposes set forth herein.

4. Although Applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their interests.

Therefore, applicant seeks an order pooling all mineral interest owners in the Bone Spring formation in the E/2E/2 of Section 34, pursuant to NMSA 1978, §§ 70-2-17, -18.

5. Approval of the non-standard unit and the pooling of all mineral interests in the Bone Spring formation underlying the E/2E/2 of Section 34 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

6. WHEREFORE, Applicant requests that, following notice and a hearing to be set for November 30, 2017, the Division enter its order:

A. Approving a non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the E/2E/2 of Section 34;

B. Pooling all mineral interests in the Bone Spring formation underlying the E/2E/2 of Section 34;


C. Designating Applicant as operator of the well;

D. Considering the cost of drilling and completing the well, and allocating the cost among the well's working interest owners;

E. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and

F. Setting a 200% charge for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,

  
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(505) 982-3873  
*Attorneys for Great Western Drilling Ltd.*