

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

**APPLICATION OF RKI EXPLORATION  
AND PRODUCTION, LLC FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.**

**CASE NO. 16480**

**RKI'S PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

RKI Exploration and Production, LLC  
3500 One Williams Center, MD 35  
Tulsa, OK 74172

**ATTORNEY**

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**APPLICANT'S STATEMENT OF CASE**

RKI Exploration and Production ("RKI") seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) in the 320-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 32, Township 22 South, Range 27 East, NMPM, Eddy County, New Mexico. The spacing unit will be dedicated to the **Boxer 32-22-27 Fee No. 401H Well**, which will be horizontally drilled from a surface location in the NE/4 SE/4 (Unit I) to a standard bottom hole location in in the NW/4 SW/4 (Unit L) of Section 32. The

completed interval for this well will remain within the standard offset required by the Special Rules for the Purple Sage Pool set forth in Order No. R-14262.

### **APPLICANT'S PROPOSED EVIDENCE**

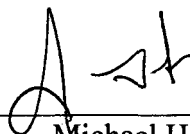
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Aaron Young—Landman	Approx. 10	Approx. 5
Kasmira Workman—Geologist	Approx. 10	Approx. 3

### **PROCEDURAL MATTERS**

If uncontested, this case will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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