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

APPLICATION OF HILCORP ENERGY COMPANY FOR COMPULSORY POOLING, SAN JUAN COUNTY, NEW MEXICO.

CASE NOS. 20654

HILCORP'S PREHEARING STATEMENT

Hilcorp Energy Company, ("Hilcorp") (OGRID No. 372171), through its undersigned

counsel, hereby submits this Consolidated Pre-Hearing Statement for the above referenced cases

scheduled for hearing before the Division Examiners on July 11, 2019.

APPEARANCES

APPLICANT

ATTORNEYS

Hilcorp Energy Company 1111 Travis St. Houston, Texas 77002 Michael H. Feldewert, Esq. Adam G. Rankin, Esq. Kaitlyn A. Luck, Esq. Julia Broggi, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com kaluck@hollandhart.com

STATEMENT OF THE CASE

Hilcorp seeks an order pooling all uncommitted interests in the Mesaverde formation

underlying the S/2 of Section 30, Township 29 North, Range 10 West, NMPM, San Juan County,

New Mexico, to form a standard 320-acre gas spacing unit within the Mesaverde formation.

Hilcorp proposes to dedicate the above-reference spacing unit to its Abrams Gas Com E 1 Well

(API No. 30-045-07815), to be recompleted at a standard gas well location in NE/4 SE/4 (Unit I)

of Section 30 to a depth sufficient to test the Mesaverde formation. The well was previously drilled and completed within the Dakota formation at a surface location 1,790 feet from the south line and 890 feet from the east line of Section 30, and a bottom-hole location approximately 1,790 feet from the south line and 890 feet from the east line of Section 30, and dedicated to a standard 320-acre gas spacing unit in the Basin-Dakota Pool (Pool Code 71599), comprised of the S/2 of Section 30.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brad Pearson, Landman	Approx. 15	Approx. 5

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP

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ATTORNEYS FOR HILCORP ENERGY COMPANY