	ABOVE THIS LINE FOR DIVISION USE ONLY NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - 1220 South St. Francis Drive, Santa Fe, NM 87505 Lea Unit Fed #
	ADMINISTRATIVE APPLICATION CHECKLIST 59.33
	THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE
Applic	<pre>which Reduke PROCESSING AT THE DIVISION LEVEL IN SANTA PE cation Acronyms:  [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]  [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]  [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]  [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]  [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]  [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]  [TVIDE OF A DDI LC A TION. Check These Which Analy for [A]</pre>
[1]	TYPE OF APPLICATION - Check Those Which Apply for [A]         [A]       Location - Spacing Unit - Simultaneous Dedication         [A]       Location - Spacing Unit - Simultaneous Dedication         [A]       NSL         [A]       NSP         [A]       NSP         [A]       SD         Check One Only for [B] or [C]         [B]       Commingling - Storage - Measurement         [DHC       CTB         PLC       PC         OLS       OLM
	<ul> <li>[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery</li> <li>WFX PMX SWD IPI EOR PPR</li> <li>[D] Other: Specify</li></ul>
[2]	NOTIFICATION REQUIRED TO: - Check Those Which Apply, or (Does Not Apply)         [A]       Working, Royalty or Overriding Royalty Interest Owners
	[B] Offset Operators, Leaseholders or Surface Owner
	[C] Application is One Which Requires Published Legal Notice
	[D] Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
	[E] For all of the above, Proof of Notification or Publication is Attached, and/or,
	[F] Waivers are Attached
[3]	SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.
	<b>CERTIFICATION:</b> I hereby certify that the information submitted with this application for administrative oval is <b>accurate</b> and <b>complete</b> to the best of my knowledge. I also understand that <b>no action</b> will be taken on this cation until the required information and notifications are submitted to the Division. Note: Statement.must be completed by an individual with managerial and/or supervisory capacity.
s Bruce Box 10: Fe. Ne	a duest blue Attorney for Applicant

JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213 SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone) (505) 660-6612 (Cell) (505) 982-2151 (Fax)

jamesbruc@aol.com

July 14, 2008

Hand delivered

Mark E. Fesmire, P.E. Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Mr. Fesmire:

Pursuant to Division Rule 104.F(2), Samson Resources Company applies for approval of an unorthodox oil well location for the following well:

<u>Well</u> :	Lea Unit Fed. No. 29
Location:	1225 feet FNL & 1905 feet FWL
Well Unit:	E <sup>1</sup> / <sub>2</sub> NW <sup>1</sup> / <sub>4</sub> of Section 24, Township 20 South, Range 34 East,
	N.M.P.M., Lea County, New Mexico

The well will be drilled to a depth sufficient to test the Morrow formation, and the location is orthodox in that zone. However, the well is prospective in the Bone Spring formation (Lea-Bone Spring Pool). Under Division Order No. R-1827, the Bone Spring is spaced on 80 acres, with wells to be within 150 feet of the center of a quarter-quarter section. A Form C-102 for the well is attached as Exhibit A.

The well's location is based upon topography and Morrow geology. There are sand dunes in this area, and the proposed location is the one that the Bureau of Land Management would approve.

A land plat is attached as Exhibit B. The  $E\frac{1}{2}NW\frac{1}{4}$  of Section 24 is covered by Federal Lease NM 01747. A serial register page from the records of the Bureau of Land Management is attached as Exhibit C. There is common ownership in the Bone Spring formation in the  $E\frac{1}{2}NW\frac{1}{4}$  of Section 24. Thus, the well does not encroach on any interest owner, and notice of this application has not been given to anyone.

Please contact me if you need any further information on this application.

Very truly yours, Suel Que James Bruce

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Attorney for Samson Resources Company

DISTRICT III 1000 Rio Brazos Rd., Aztec, Ni	M 87410				exico 87505		Fee Lease	e - 3 Copies
DISTRICT IV 1220 s. st. prancis dr., santa fe, 1	NM 87505	WELL LO	CATION	AND ACREA	GE DEDICATI	ON PLAT	AMENDI	ED REPORT
API Number		1	Pool Code			Pool Name		
Property Code	I	L		Property Nam	he	······	Welt Num	ıber
<b>-</b>			LE	A UNIT FEI			29	l
OGRID No.			SA	Operator Nam MSON RESO			Elevatio 3671	
· · · · · · · · · · · · · · · · · · ·				Surface Loca		<u> </u>		l 
UL or lot No. Section	Township	Range	Lot idn	Feet from the	North/South line	Feet from the	East/West line	County
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<u>1</u>	<u> </u>	Bottom	Hole Loc	ation If Diffe	rent From Sur	face	L	L
UL or lot No. Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
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1905'	3670.0' 	3667.6'		TIC COORDINATU NAD 27 NME =569272.5 N =751921.0 E =32.562378* N = 103.515653* 		I hereby herein is true my knowledge or unlessed mi including the p or has a right location pursus orner of such compulsory poo by the division. Signature Printed Name SURVEYO I hereby shown on this notes of actual uder my supe true and correct QCTO Date Surveye Signature & Professional	Da PR CERTIFICAT certify that the well plat was plotted fro I survers mad that the ct to the best of my DBER 1/2, 2007 d Seal of	te the this this this this this this the or a te te te te te te te te te te

#### DISTRICT I 1625 N. FRENCH DR., HORDS, NM 88240

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DISTRICT II 1301 W. GRAND AVENUE, ARTESIA, NM 88210

## State of New Mexico

Energy, Minerals and Natural Resources Department

### OIL CONSERVATION DIVISION 1220 SOUTH ST. FRANCIS DR. Santa Fe, New Mexico 87505

Form C-102 Revised October 12, 2005 Submit to Appropriate District Office State Lease ~ 4 Copies Fee Lease ~ 3 Copies

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EXHIBIT **B** 

## DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT CASE RECORDATION (MASS) Serial Register Page

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Page 1 of 2

Case Type Commodity	311111 459:	1: O&G L OIL &			Total Acres 360.000		Serial Number NMNM 0 001747		
Case Dispos		AUTHORI	ZED	Serial	l Number:	NMNM	0 00174	7	
							Int Rel	% Interest	
DEVON ENERGY			20 N BROADWAY #1500	OKLAHOMA CITY OK 73102	LESSEE			50.000000000	
LEGACY RESOL			303 W WALL ST #1600	MIDLAND TX 79701	LESSEE			50.000000000	
SAMSON RESO	URCES C	0	2 W SECOND ST	TULSA OK 74103	OPERAT	FING RIGHTS		0.000000000	
Mer Twp Rng	Sec	STyp SN	r Suff Subdivision	Seria District/Resource Area	L Number: Cou	NMNM ; inty		7 t Agency	
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06/01/1950 12/09/1959	232		IVE DATE COMMITTED TO UNIT	NMNM70976X;LEA					
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04/01/1960	570		EGREGATED BY ASGN	INTO NMNM01747-A;					
04/20/1962	651		BY PROD - ALLOCATED	LEA UA					
04/20/1962	660		OF 1ST PROD-ALLOC	LEA UA					
03/10/1987	140	ASGN F		ATLANTIC/HONDO OIL					
06/01/1987	139	ASGN A	PPROVED	EFF 04/01/87;					
06/08/1987	974	AUTOMA	TED RECORD VERIF	LQG/	RL				
08/21/1987	963	CASE M	IICROFILMED	CNUM 102,842					
08/09/1991	817	MERGER	RECOGNIZED	TXO PROD/MARATHON					
08/14/1992	140	ASGN F	ILED	HONDO O&G/DEVON ENE					
08/28/1992	909	BOND A	CCEPTED	EFF 08/28/92;WY2606					
10/01/1992	621	RLTY R	ED-STRIPPER WELL	11.7%;/1/;891006455	A				
11/02/1992	139	ASGN A	PPROVED	EFF 09/01/92;					
11/02/1992	974		TED RECORD VERIF	BCO/	AF				
03/08/1993	625		EDUCTION APPV	/1/					
06/30/1993	140	ASGN F		DEVON ENE/DEVON COR	P				
09/17/1993	139		PPROVED	EFF 07/01/93;					
09/17/1993	974		TED RECORD VERIF	SSP/K					
10/20/1993	974		TED RECORD VERIF		LV				
02/01/1999	621		RED-STRIPPER WELL	6.9%;					
01/11/2000	140	ASGN F		MARATHON/MORIAH					
04/06/2000	139		PPROVED	EFF 02/01/00;					
04/06/2000	974		TED RECORD VERIF	JLV					
04/20/2000	625	RLTY R	EDUCTION APPV						

NO WARRANTY IS MADE BY BLM FOR USE OF THE DATA FOR PURPOSES NOT INTENDED BY BLM



## DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT CASE RECORDATION (MASS) Serial Register Page

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Page 2 of 2

Case Type Commodity	311111 459:	TAT0437;30USC226 : O&G LSE NONCOMP PUB LAND OIL & GAS L .UTHORIZED	Total Acres Serial I 360.000 NMNM	Number 0 001747
11/22/2000	817	MERGER RECOGNIZED	DEVONENE/DEVONENE PROD	
11/22/2000	974	AUTOMATED RECORD VERIF	АТ	
04/01/2001	621	RLTY RED-STRIPPER WELL	8.5%;	
07/06/2001	625	RLTY REDUCTION APPV		
06/01/2002	621	RLTY RED-STRIPPER WELL	6.9%;/4/891006455A	
08/01/2003	621	RLTY RED-STRIPPER WELL	6.9%;/5/891006455A	
09/11/2003	625	RLTY REDUCTION APPV	/4/	
10/30/2003	625	RLTY REDUCTION APPV	/5/	
10/01/2004	621	RLTY RED-STRIPPER WELL	7.7%;	
02/01/2005	621	RLTY RED-STRIPPER WELL	11.7%/6/	
04/06/2005	626	RLTY REDUCTION DENIED		
05/09/2006	140	ASGN FILED	BROTHERS/LEGACY RES;1	
05/09/2006	140	ASGN FILED	MORIAH RE/LEGACY RE;1	
09/07/2006	139	ASGN APPROVED	01EFF 06/01/06;	
09/07/2006	139	ASGN APPROVED	02EFF 06/01/06;	
09/07/2006	974	AUTOMATED RECORD VERIF	TF/TF	
09/13/2006	625	RLTY REDUCTION APPV		
04/04/2007	932	TRF OPER RGTS FILED	LEGACY RE/SAMSON RE;1	
06/11/2007	933	TRF OPER RGTS APPROVED	EFF 05/01/07;	
06/11/2007	974	AUTOMATED RECORD VERIF	JLV	
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05/29/2008	974	AUTOMATED RECORD VERIF	ANN	
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0002 09/07/2006 - BONDED LESSEE 0003 LEGACY RESOURCES OPERATING, LP - NMB000394 SW/NM

> NO WARRANTY IS MADE BY BLM FOR USE OF THE DATA FOR PURPOSES NOT INTENDED BY BLM

## Brooks, David K., EMNRD

From:Brooks, David K., EMNRDSent:Friday, September 05, 2008 8:02 AMTo:'JamesBruc@aol.com'Subject:Samson - Lea Unit Fed #29

Dear Jim

You have requested approval for an NSL for the well 1225 FNL and 1905 FWL of 24-20S-34E.

Our file contains an approved APD showing the same well name and a location 1310 FNL and 1948 FWL.

Please clarify.

Thanks

David

# Brooks, David K., EMNRD

From:JamesBruc@aol.comSent:Friday, September 05, 2008 8:04 AMTo:Brooks, David K., EMNRDSubject:Re: Samson - Lea Unit Fed #29

David: I'm always the last to know. I'll check and get back to you.

Jim

It's only a deal if it's where you want to go. Find your travel deal here.

This inbound email has been scanned by the MessageLabs Email Security System.

JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213 SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone) (505) 660-6612 (Cell) (505) 982-2151 (Fax)

jamesbruc@aol.com

October 2, 2008

David K. Brooks Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Re: Administrative application for an unorthodox oil well location:

<u>Well</u> :	Lea Unit Fed. No. 29
Well Unit:	E <sup>1</sup> / <sub>2</sub> NW <sup>1</sup> / <sub>4</sub> of Section 24, Township 20 South, Range 34 East,
	N.M.P.M., Lea County, New Mexico

Dear Mr. Brooks:

Regarding your e-mail (**Exhibit A**): The original requested location of 1225 feet FNL and 1905 feet FWL has indeed been moved to 1310 feet FNL and 1948 feet FWL. **Exhibit B**. The well was moved south and east to locate the well further away from existing pipelines. **Exhibit C**. The location is internal to the well unit, so notice is not required.

The well remains orthodox for the primary target, the Morrow formation (Lea-Pennsylvanian Gas Pool, which is spaced on 160 acres).

Very truly yours,

Attorney for Samson Resources Company

RECEIVED 2008 OCT 6 PM 3 25

and the second second

Subj:Samson - Lea Unit Fed #29Date:9/5/2008 9:02:10 A.M. Mountain Daylight TimeFrom:david.brooks@state.nm.usTo:JamesBruc@aol.com

Dear Jim

You have requested approval for an NSL for the well 1225 FNL and 1905 FWL of 24-20S-34E.

Our file contains an approved APD showing the same well name and a location 1310 FNL and 1948 FWL.

Please clarify.

Thanks

David

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.



Friday, September 05, 2008 America Online: JamesBruc

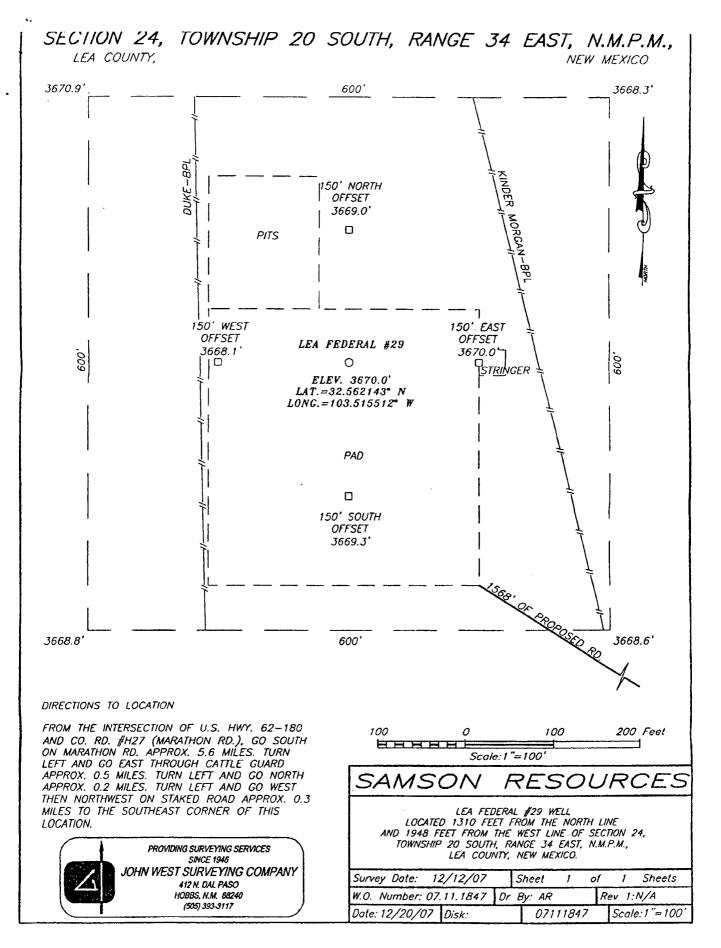
<b>QCD-HOBBS</b>		7.	•	-5-08-698	
Form 3160-3. (April 2004) SECRETARY'S POTA	FORM APPROVED OMB No. 1004-0137 Expires March 31, 2007				
UNITED STATE DEPARTMENT OF THE	5. Lease Serial No.				
BUREAU OF LAND MA			6 If Indian, Alloted		
1a. Type of work: X DRILL REEN	TER		7 If Unitor CA Agr	cement, Name and No.	
1b. Type of Well: Onl Well X Gas Well Other	Single Zonc X Multi	iple Zoac	8. Lease Name and Lea Fede		
2 Name of Operator SAMSON RESOURCES COMPANY	57 N: Duke Roush		9. API Well No. 30 - 02	5-39077	
3a. Address	3b. Phone No. (include area code)		10. Field and Pool, or	Exploratory	
Two West Second Street, Tulsa, OK 74103	(432) 686-6336			Penn Gas	
4. Location of Well (Report location clearly and in accordance with At surface 1310' FNL & 1948' FWL	any State requirements.") LnHC			Blk. and Survey or Area	
At proposed prod. zone Same			Section 2	4, T20S, R34E	
14. Distance in miles and direction from nearest town or post office*			12. County or Parish	13. State	
26 miles SW of Hobbs, NM	16. No. of acres in lease	17 Smail	Lea g Unit dedicated to this	NM NM	
Is bisance non proposed location to nearest property or lease line, fl. 1310 <sup>9</sup> (Also to nearest drig, unit line, if any)	16. No. of acres in lease 320	17. opacin	160 acres	wcii	
18. Distance from proposed location*	19. Proposed Depth	20. BLM/I	W/BIA Bond No. on file		
to nearest well, drilling, completed, applied for, on this lease, ft. N/A	13,500'		NM 2037		
21. Elevations (Show whether DF, KDB, RT, GL, etc.) 3670' GL	22. Approximate date work will sta Upon approva		23 Estimated duration 35-40 days		
	24. Attachments		35-40	uays	
<ol> <li>A Drilling Plan.</li> <li>A Surface Use Plan (if the location is on National Forest System SUPO shall be filed with the appropriate Forest Service Office).</li> </ol>		cation specific info	rmation and/or plans a	s may be required by the	
25. Signature	Name (Printed/Typed)			Date 5/14/08	
Title Authorized Agent	)K  : Kenneti	h C. Dick	eson	5/14/08	
Approved by (Signature), William Merhege	Name (Printed/Typed) Win III an	Merk	AQL	DateJUL 2 1 20	
Tige Aeting STATE DIRECTOR	Office		STATE OFFR		
Application approval does not warrant or certify that the applicant ho	lds legal or equitable title to those right		· · ·		
conduct operations thereon. Conditions of approval, if any, are attached.			ROVAL FOR		
Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a	crime for any person knowingly and				
States any false, fictitious or fraudulent statements or representations a	s to any matter within its jurisdiction.				
*(Instructions on page 2)	Aeréinei	D			
Capitan Controlled Water Basin	AUR - 4 2008				
E ATTACHED FOR	HUBBEN				
NDITIONS OF APPROVAL		Approval	Subject to Genera		
ν <b>φ του</b> π <sup>1</sup> <sup>2</sup> <sup>2</sup> <sup>2</sup> <sup>2</sup> <sup>2</sup>	_		1 Stipulation		
	2				
	EXHIBIT				

. **'**.

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				State	of Ne	w Mexico				
DISTRICT I 1625 N. FRENCH DR., HOBBS, NW 64	8240		Energy.	Minerals an	nd Natural	Resources Department				
DISTRICT II 1301 W. GRAND AVENUE, ARTESIA, NU UISTRICT III	68210	OIL	1220 3	SOUTH	ST.	ON DIVIS FRANCIS DR. exico 87505	ION Subm	Revised Oct ait to Appropriate I State Leas	Form C-102 ober 12, 2005 District Office e - 4 Copies e - 3 Copies	
1000 Rio Brazos Rd., Aztec, M DISTRICT IV			0. TYON							
1220 S ST. FRANCIS DR., SANTA FE,	NM 87505			AND	ACREA	GE DEDICATI		C AMEND	ED REPORT	
API Number 30-025-391	077		DD41	2		100	Penn Penn	1000		
Property Code 34342				Prop	FEDER.	ie	<u>rent</u>	Zell Nu 29		
00GRID No. 20165			SA	Oper MSON	RESO			Elevat 367		
				Surfa	ce Loca	ation				
UL or lot No. Section	Township	Range	Lot Idn	Feet fr	om the	North/South line	Feet from the	East/West line	County	
C 24	20-S	34-E		13	10	NORTH	1948	WEST	LEA	
r		,				rent From Sur	face			
UL or lot No. Section	Township	Range	Lot Idn	Feet fr	om the	North/South line	Feet from the	East/West line	County	
Dedicated Acres Joint	or Infill Co	nsolidation (	Code Or	der No.						
NO ALLOWABLE								EEN CONSOLID	ATED	
	URAN	ION-STAN	DARD UT	VIT HAS	BEEN	APPROVED BY	THE DIVISION			
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