

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

IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION  
FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF SAMSON RESOURCES  
COMPANY FOR COMPULSORY POOLING AND  
APPROVAL OF AN UNORTHODOX GAS WELL  
LOCATION, EDDY COUNTY, NEW MEXICO.

Case No. 13353

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Samson Resources Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Samson Resources Company  
Suite 1170  
200 North Lorraine  
Midland, Texas 79701

Attention: Peggy Kerr  
(432) 683-7063

APPLICANT'S ATTORNEY

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interests from the base of the Bone Spring formation to the base of the Morrow formation underlying the E $\frac{1}{2}$  of Section 17, Township 18 South, Range 30 East, NMPM to form a standard 320-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within that vertical extent. The unit will be dedicated to applicant's Sand Tank "17" Fed. Com. Well No. 1, to be re-entered and completed at an unorthodox location 2310 feet from the north line and 660 feet from the east line (Unit H) of Section 17. Applicant also requests approval of an unorthodox gas well location for the well. Also to be considered will be the cost of re-entering and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in re-entering and completing the well.

*Except the STRAIN*

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
Elizabeth Moses  
(landman)

EST. TIME  
15 min.

- EXHIBITS
1. Land plat
  2. Ownership listing
  3. Correspondence
  4. AFE
  5. Notice affidavit

OPPONENT

WITNESSES

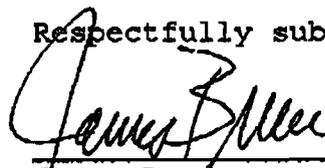
EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Samson Resources  
Company