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November 22, 2017

Florene Davidson
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505
VIA: florene.davidson@state.nm.us

Re: Case 15873
Application of Sojourner Drilling Corporation for Compulsory Pooling,
Curry County, New Mexico

Dear Florene:

Attached for filing is the Applicant's Pre-Hearing Statement in the above case.

Sincerely,


Karen Aubrey

Attorney for Sojourner Drilling Corporation

ka/pjg

enclosure

xc: Linda Powell

Evelyn B. Wallace Richter, Co-Trustee
Travis Walne, Northern Trust, Co-Trustee
Robert Key

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: Case No. 15873
APPLICATION OF SOJOURNER DRILLING
CORPORATION FOR COMPULSORY POOLING,
CURRY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Sojourner Drilling Corporation
810 Anson, Avenue
Abilene, TX 79601
Attn: Elma Bernal

APPLICANT'S ATTORNEY

Karen Aubrey
P.O. Box 8435
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OPPONENT

Linda Powell
P.O. Box 605
Plains, TX 79355

OPPONENT'S ATTORNEY

Trust u/w/o EVELYN G. BROWN
FBO EVELYN B. WALLACE RICHTER
The Northern Trust Company and
Evelyn B. Richter Co-Trustees
250 Sandpiper Drive
Palm Beach, FL 33480

Trust u/w/o ALGERNON W. BROWN
FBO EVELYN B. WALLACE RICHTER
The Northern Trust Company and
Evelyn B. Richter Co-Trustees
250 Sandpiper Drive
Palm Beach, FL 33480

Iris L. Bradley Vice President/ Travis Walne
Oil, Gas and Minerals Manager
Northern Trust
16475 Dallas Parkway
Addison, TX 75001

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order pooling all mineral interests in the Canyon formation underlying the NE/4 of Section 34, Township 6 North, Range 34 East, NMPM, for all pools or formations developed on 160 acre spacing within the vertical extent, including the WC0009 No. 63434G, Canyon Gas Pool. The unit will be dedicated to the Frio Lands #1 Well, a vertical well with a surface location 1929 FNL and 1962 FEL of Section 34. Also to be considered will be the cost of drilling 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 drilling and completing the well. The spacing unit is located approximately 20 miles north of Clovis, New Mexico.

OPPONENT:

PROPOSED EVIDENCE

APPLICANT:

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Robert Key (Landman)	15 minutes	Approx. 6
James Gilbert (Geology)	15 minutes	Approx. 4

OPPONENT:

PROCEDURAL MATTERS

Respectfully submitted,

LAW OFFICE OF KAREN AUBREY

By 

Karen Aubrey

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Santa Fe, NM 87504

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Attorney for Applicant