

**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 SOJOURNER DRILLING  
CORPORATION FOR COMPULSORY POOLING,  
CURRY COUNTY, NEW MEXICO.**

**Case No. 15873**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by (1) Linda Powell, and (2) The Northern Trust Company, Co-Trustee of the Evelyn Richter Trusts under the wills of Algernon W. Brown and Evelyn G. Brown, as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Sojourner Drilling Corporation

**OPPONENT**

The Northern Trust Company  
Dallas, Texas

Linda Powell  
Plains, Texas

**APPLICANT'S ATTORNEY**

Karen Aubrey

**OPPONENT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
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**STATEMENT OF THE CASE**

**APPLICANT**

Sojourner Drilling Corporation ("Sojourner") seeks an order pooling the Canyon formation underlying the NE/4 of Section 34, Township 6 North, Range 34 East, NMPM.

**OPPONENT**

Opponents are unleased mineral interest owners in the NE/4 of Section 6. Opponents assert that Sojourner has not satisfied the Division's requirements to file a pooling application, and requests that the application be denied.

**PROPOSED EVIDENCE**

**APPLICANT**

**WITNESSES**

**EST. TIME**

**EXHIBITS**

**OPPONENTS**

**WITNESSES**

**EST. TIME**

**EXHIBITS**

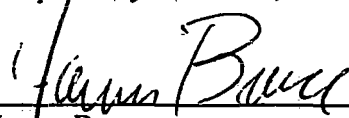
Robert Bell  
(landman)

30 min.

Approx. 12

**PROCEDURAL MATTERS**

Respectfully submitted,


  
James Bruce  
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(505) 982-2043

Attorney for Linda Powell, and The  
Northern Trust Company, Co-Trustee of the  
Evelyn Richter Trusts under the wills of  
Algernon W. Brown and Evelyn G. Brown

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following  
counsel of record this 22nd day of November, 2017 by e-mail:

Karen Aubrey  
[ka@karenaubreyllaw.com](mailto:ka@karenaubreyllaw.com)

  
James Bruce