

**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 EDGE PETROLEUM  
EXPLORATION COMPANY FOR COMPULSORY  
POOLING, LEA COUNTY, NEW MEXICO.**

**Case No. 13,924**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Edge Petroleum Exploration Company  
Suite 2000  
1301 Travis  
Houston, Texas 77002

Attention: Case Quast

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. 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 surface to the base of the Devonian formation underlying the SW/4NW/4 of Section 25, Township 16 South, Range 36 East, NMPM, to form a 40-acre oil spacing and proration unit for all formations and/or pools developed on 40 acre spacing within that vertical extent. 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 Edge Petroleum Operating Company, Inc. as operator of the well, and a 200% charge for the risk involved in drilling and completing the well.

WTT 5/13/07

OPPONENT**PROPOSED EVIDENCE**APPLICANTWITNESSES

Case Quast  
(landman)

EST. TIME

20 min.

EXHIBITS

Approx. 6

OPPONENTWITNESSESEST. TIMEEXHIBITS**PROCEDURAL MATTERS**

Respectfully submitted,



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

Attorney for Edge Petroleum Exploration  
Company