

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 GMT EXPLORATION  
COMPANY LLC FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.

Case No. 14,184

AMENDED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by GMT Exploration Company LLC as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

GMT Exploration Company LLC  
Suite 800  
1560 Broadway  
Denver, Colorado 80202

APPLICANT'S ATTORNEY

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

Attention: Megan S. Albrecht  
(720) 946-3028

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

GMT Exploration Company LLC seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the E/2 of Section 28, Township 18 South, Range 34 East, NMPM, to form a standard 320-acre gas spacing and proration unit for any and all formations or pools developed on 320-acre spacing within that vertical extent, including the Undesignated La Rica-Morrow Gas Pool. The unit is to be designated to the NW Raptor 43-28 State Com. Well No. 1, to be drilled at an orthodox gas well location in the NE/4SE/4 of Section 28. 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

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applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Testimony in this case, and all pertinent exhibits, were submitted at the September 18<sup>th</sup> hearing. The case was re-advertised simply to correct the well name.

Due to rig availability, applicant requests issuance of an expedited order.

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



James Bruce  
Post Office Box 1056  
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GMT Exploration Company LLC