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December 30, 2003

RECEIVED

DEC 30 2003

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Via Hand Delivery

Florene Davidson
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Case 13208

Dear Florene:

Enclosed for filing are an original and one copy of two applications for compulsory pooling, together with proposed advertisements, filed on behalf of Samson Resources Company. Please set these matters for the January 22, 2004 Examiner hearing. Thank you.

The advertisements are also on the enclosed disk.

Very truly yours,


James Bruce

Attorney for Samson Resources Company

Parties Being Pooled

N½ §28-21S-35E

EOG Resources, Inc.
P.O. Box 2267
Midland, Texas 79702

Apache Corporation
Two Warren Place
Suite 1500
6120 South Yale
Tulsa, Oklahoma 74136

Attention: Mario R. Moreno, Jr.

N½ §15-20S-33E

Pure Energy Group, Inc.
Suite 220
153 Treeline Park
San Antonio, Texas 78209-1880

Pure Energy Group, Inc.
Suite 1925
700 North St. Mary's Street
San Antonio, Texas 78205

Chisos, Ltd.
Suite 1200
1221 Lamar Street
Houston, Texas 77010

Attention: Greg Bonaguerio

Todd Upson
7002 Clearspring Parkway
Garland, Texas 75044

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BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF SAMSON RESOURCES
COMPANY FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

DEC 8 2003
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505
Case No. 13202

APPLICATION

Samson Resources Company applies for an order pooling all mineral leasehold interests from the surface to the base of the Morrow formation underlying the N $\frac{1}{2}$ of Section 28, Township 21 South, Range 35 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

1. Applicant is an interest owner in the N $\frac{1}{2}$ of Section 28, and has the right to drill a well thereon.

2. Applicant proposes to drill its Longhorn "28" State Well No. 1, at an orthodox location in the NW $\frac{1}{4}$ NW $\frac{1}{4}$ (Unit D) of Section 28, to a depth sufficient to test the Morrow formation, and seeks to dedicate the following acreage to the well:

(a) the NW $\frac{1}{4}$ NW $\frac{1}{4}$ of Section 28 to form a standard 40 acre oil spacing and proration unit for any and all formations and/or pools developed on 40 acre spacing within that vertical extent, including the Undesignated Northeast San Simon Wolfcamp Pool;

(b) the NW $\frac{1}{4}$ of Section 28 to form a standard 160 acre gas spacing and proration unit for any and all formations and/or pools developed on 160 acre spacing within that vertical extent; and

(c) the N $\frac{1}{2}$ of Section 28 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, including the Undesignated East Grama Ridge-Morrow Gas Pool.

3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral leasehold interest owners in the N½ of Section 28 for the purposes set forth herein.

4. Although applicant attempted to obtain voluntary agreements from all mineral leasehold interest owners to participate in the drilling of the well, or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all mineral leasehold interests in the N½ of Section 28, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral leasehold interests underlying the N½ of Section 28 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, Applicant requests that, after notice and hearing, the Division enter its order:

- A. Pooling all mineral leasehold interests in the N½ of Section 28 from the surface to the base of the Morrow formation;
- B. Designating applicant as operator of the well;
- C. Considering the cost of drilling and completing the well, and allocating the cost thereof among the well's working interest owners;

D. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and

E. Setting a 200% charge for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "James Bruce", is written over a horizontal line.

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

Attorney for Samson Resources
Company