

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF GRUY PETROLEUM  
MANAGEMENT CO. TO EXPAND THE  
WHITE CITY-PENNSYLVANIAN GAS  
POOL, EDDY COUNTY, NEW MEXICO.

No. 13139

AFFIDAVIT OF ANDY JUETT

STATE OF TEXAS                    )  
                                      ) ss.  
COUNTY OF DALLAS                )

Andy Juett, being duly sworn upon his oath, deposes and states:

1. I am over the age of 18, and have personal knowledge of the matters set forth herein.

2. I am a geologist for applicant.

3. Applicant requests that the White City-Pennsylvanian Gas Pool be expanded to include all of Section 14, Township 24 South, Range 26 East, N.M.P.M.

4. The Bradley Fed. Com. Well No. 1 has been drilled and completed by applicant in the SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 14, and is producing from the Strawn formation and the Morrow formation.

5. Attached as Exhibit A is a stratigraphic cross-section of the lower Strawn formation in part of Township 24 South, Range 26 East, N.M.P.M., including (a) the Bradley Fed. Com. Well No. 1. (b) the Pennzoil Fed. Com. Well No. 1 in the NE $\frac{1}{4}$ SE $\frac{1}{4}$  of Sections 15, and (c) the Federal 22 Com. Well No. 1 in the NE $\frac{1}{4}$ NE $\frac{1}{4}$  of Section 22.

6. The data shows that the three wells are producing from the same interval. Therefore, the Bradley Fed. Com. Well No. 1 is producing from the same zones producible in the White City-Pennsylvanian Gas Pool.

\_\_\_\_\_  
Andy Juett

SUBSCRIBED AND SWORN TO before me this \_\_\_\_\_ day of October, 2003, by Andy Juett.

\_\_\_\_\_  
Notary Public

My Commission Expires:  
\_\_\_\_\_

OIL CONSERVATION DIVISION

CASE NUMBER \_\_\_\_\_

EXHIBIT 2