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 SAMSON RESOURCES COMPANY FOR COMPULSORY POOLING AND APPROVAL OF AN UNORTHODOX GAS WELL LOCATION, LEA COUNTY, NEW MEXICO. M. 51-04

Case No. 13207

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Samson Resources Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT
Samson Resources Company
Suite 1170
200 North Lorraine
Midland, Toxas 79701

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

Attention:

Peggy Kerr (432) 683-7063

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 Morrow formation underlying the N% of Section 15, Township 20 South, Range 33 East, NMPM 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 but not limited to the Undesignated Teas-Pennsylvanian Gas Pool, Undesignated East Gem-Morrow Gas Pool, and Undesignated Quail Ridge-Morrow Gas Pool. The unit will be dedicated to applicant's Bandit "15" Fed. Well No. 1, to be drilled at a location approximately 810 feet from the north line and 660 feet from the east line (in Unit A) of Section 15. Applicant also requests unorthodox location approval for the well in the Teas-Pennsylvanian Gas Pool and Quail Ridge-Morrow Gas Pool. 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 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

EST. TIME EXHIBITS

(landman) 10 min.

Land plat
 Correspondence

3. AFE

4. Offset list

5. Notice affidavit

OPPONENT

<u>WITNESSES</u> E

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

-None-

Respectfully submitted,

James Bruce

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Attorney for Samson Resources Company