

DATE IN 11/16/07	SUSPENSE	ENGINEER Brooks	LOGGED IN 11/16/07	NSL TYPE	APP NO PKUR0732053871
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ABOVE THIS LINE FOR DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
- Engineering Bureau -  
1220 South St. Francis Drive, Santa Fe, NM 87505



*Samson Resources Company*  
Federal # 8  
5779

**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Application Acronyms:**

**[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]**  
**[DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]**  
**[PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]**  
**[WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]**  
**[SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]**  
**[EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]**

**[1] TYPE OF APPLICATION** - Check Those Which Apply for [A]

[A] ☒ Location - Spacing Unit - Simultaneous Dedication

☒ NSL ☐ NSP ☐ SD

Check One Only for [B] or [C]

[B] ☐ Commingling - Storage - Measurement

☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] ☐ Injection - Disposal - Pressure Increase - Enhanced Oil Recovery

☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

[D] ☐ Other: Specify \_\_\_\_\_

**[2] NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or Does Not Apply

[A] ☐ Working, Royalty or Overriding Royalty Interest Owners

[B] ☒ Offset Operators, Leaseholders or Surface Owner

[C] ☐ Application is One Which Requires Published Legal Notice

[D] ☐ Notification and/or Concurrent Approval by BLM or SLO  
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office

[E] ☒ For all of the above, Proof of Notification or Publication is Attached, and/or,

[F] ☐ Waivers are Attached

RECEIVED  
2007 NOV 16 PM 2 31

**[3] SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

**[4] CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

*James Bruce*

Print or Type Name

*James Bruce*

Signature

*Attorney for Applicant*

Title

Date

11/16/07

*jamesbruce@aol.com*

e-mail Address

*Draft order on CDave Order*

**JAMES BRUCE**  
ATTORNEY AT LAW

POST OFFICE BOX 1056  
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213  
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)  
(505) 660-6612 (Cell)  
(505) 982-2151 (Fax)

[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

November 16, 2007

Hand delivered

Michael E. Fesmire  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Dear Mr. Fesmire:

Pursuant to Division Rule 104.F(2), Samson Resources Company applies for approval of an unorthodox gas well location for the following well:

<u>Well:</u>	Federal 11 Well No. 8
<u>Location:</u>	510 feet FNL & 810 feet FWL
<u>Well Unit:</u>	NW¼ of Section 11, Township 20 South, Range 34 East, N.M.P.M., Lea County, New Mexico

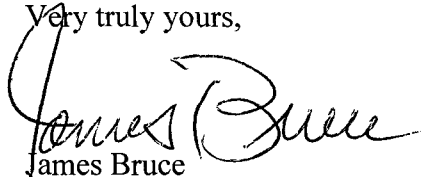
The well will be drilled to a depth sufficient to test the Morrow formation (Lea-Pennsylvanian Gas Pool). Under Order No. R-7830, as amended, the pool is spaced on 160 acres, with wells to be no closer than 660 feet to a quarter section line. An APD, with a Form C-102 for the well is attached as Exhibit A.

The well's location is based upon topographic reasons. Applicant desired to drill the well at a standard location 660 feet FNL & FWL. See Exhibit A. However, the Bureau of Land Management (the surface and mineral owner) will only allow the well to be drilled at the above location (for wildlife reasons).

Attached as Exhibit B is a land plat of the area. The offsetting S½ of Section 2 is subject to state Lease LG-2750-1, under which applicant is the sole working interest owner. Because there is a difference in royalty ownership between the proposed well and the affected offsetting acreage, notice of this application has been given to the State Land Office. See Exhibit C. Applicant notes that the S½ of Section 2 does have a producing Lea- Pennsylvanian well on it. Exhibit D.

Please contact me if you need any further information on this application.

Very truly yours,

  
James Bruce  
Attorney for Samson Resources Company

Order R-2707 - original 320 acre  
amendment. Case 3044 5-25-64  
Order R-7830-A - No expansion  
of Lea Penn. Recognized  
160-acre spacing under then rule  
Case 8447 - 7-3-85

OPERATOR'S COPY

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

APPLICATION FOR PERMIT TO DRILL OR REENTER

FORM APPROVED  
OMB No. 1004-0137  
Expires March 31, 2007

1a. Type of work: <input checked="" type="checkbox"/> DRILL <input type="checkbox"/> REENTER		5. Lease Serial No. <b>NM-0631</b>
1b. Type of Well: <input type="checkbox"/> Oil Well <input checked="" type="checkbox"/> Gas Well <input type="checkbox"/> Other <input type="checkbox"/> Single Zone <input checked="" type="checkbox"/> Multiple Zone		6. If Indian, Allottee or Tribe Name
2. Name of Operator <b>SAMSON RESOURCES COMPANY</b> <b>ATTN: BRAD P. HARGROVE</b>		7. If Unit or CA Agreement, Name and No.
3a. Address <b>Two West Second Street, Tulsa, OK 74103</b>		8. Lease Name and Well No. <b>Federal "11" Well #8</b>
3b. Phone No. (include area code) <b>(918) 583-1791</b>		9. API Well No.
4. Location of Well (Report location clearly and in accordance with any State requirements*) At surface <b>516' 660' FNL &amp; 660' FWL Per SW attached Dated 9-27-07</b> At proposed prod. zone <b>same</b> <b>Capitan Controlled Water Basin</b>		10. Field and Pool, or Exploratory <b>Lee Bone Springs / Morrow</b>
14. Distance in miles and direction from nearest town or post office* <b>24 miles SW of Hobbs, NM</b>		11. Sec., T. R. M. or Blk. and Survey or Area <b>Section 11, T-20-S, R-34-E</b>
15. Distance from proposed* location to nearest property or lease line, ft. (Also to nearest drig. unit line, if any) <b>660'</b>	16. No. of acres in lease <b>320</b>	17. Spacing Unit dedicated to this well <b>160 acres</b>
18. Distance from proposed location* to nearest well, drilling, completed, applied for, on this lease, ft. <b>N/A</b>	19. Proposed Depth <b>13,900'</b>	20. BLM/BIA Bond No. on file
21. Elevations (Show whether DF, KDB, RT, GL, etc.) <b>3652' GL</b>	22. Approximate date work will start* <b>8/15/2007</b>	23. Estimated duration <b>35-40 days</b>

24. Attachments

The following, completed in accordance with the requirements of Onshore Oil and Gas Order No. 1, shall be attached to this form:

- Well plat certified by a registered surveyor.
- A Drilling Plan.
- A Surface Use Plan (if the location is on National Forest System Lands, the SUPO shall be filed with the appropriate Forest Service Office).
- Bond to cover the operations unless covered by an existing bond on file (see item 20 above).
- Operator certification
- Such other site specific information and/or plans as may be required by the authorized officer.

25. Signature 	Name (Printed/Typed) <b>Kenneth C. Dickeson</b>	Date <b>6-25-07</b>
Title <b>Authorized Agent</b>		
Approved by (Signature) 	Name (Printed/Typed) <b>Don Peterson</b>	Date <b>11/5/07</b>
Title <b>FIELD MANAGER</b>		
Office <b>CARLSBAD FIELD OFFICE</b>		

Application approval does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

Conditions of approval, if any, are attached.

APPROVAL FOR TWO YEARS

Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

\*(Instructions on page 2)

SEE ATTACHED FOR  
CONDITIONS OF APPROVAL

APPROVAL SUBJECT TO  
GENERAL REQUIREMENTS  
AND SPECIAL STIPULATIONS  
ATTACHED

EXHIBIT

**A**

UNITED STATES **OPERATOR'S COPY**  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

FORM APPROVED  
OMB NO. 1004-0137  
Expires July 31, 2010

**SUNDRY NOTICES AND REPORTS ON WELLS**  
*Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.*

**SUBMIT IN TRIPLICATE** - Other instructions on page 2

1. Type of Well <input type="checkbox"/> Oil Well <input checked="" type="checkbox"/> Gas Well <input type="checkbox"/> Other		5. Lease Serial No.
2. Name of Operator Samson Resources Company		6. If Indian, Allottee or Tribe Name
3a. Address 200 N. Loraine St., Ste 1010; Midland, TX 79701	3b. Phone No. (include area code) (432) 683-7063	7. If Unit or CA/Agreement, Name and/or No.
4. Location of Well (Footage, Sec., T., R., M., or Survey Description) 510' FNL & 810' FWL Sec. 11-20S-34E		8. Well Name and No. Federal 11-20-34 No. 8
		9. API Well No.
		10. Field and Pool, or Exploratory Area Lea Undsg:Morrow
		11. County or Parish, State Lea NM

12. CHECK APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION			
<input checked="" type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Fracture Treat	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input type="checkbox"/> Recomplete	<input type="checkbox"/> Other
	<input checked="" type="checkbox"/> Change Plans	<input type="checkbox"/> Plug and Abandon	<input type="checkbox"/> Temporarily Abandon	
	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal	

13. Describe Proposed or Completed Operation (clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recomplate horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be performed or provide the Bond No. on file with BLM/BIA. Required subsequent reports shall be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompletion in a new interval, a Form 3160-4 shall be filed once testing has been completed. Final Abandonment Notices shall be filed only after all requirements, including reclamation, have been completed, and the operator has determined that the final site is ready for final inspection.)

Change Location:

From 660' FNL & 660' FWL  
To: 510' FNL & 810' FWL

14. I hereby certify that the foregoing is true and correct Name (Printed/Typed) Duke Roush		Title Landman
Signature <i>Duke Roush</i>		Date 9/27/07
<b>THIS SPACE FOR FEDERAL OR STATE OFFICE USE</b>		
Approved by <i>[Signature]</i>	<i>[Signature]</i> FIELD MANAGER	Date 11/5/07
Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.		Office CARLSBAD FIELD OFFICE
Title 18 U.S.C. Section 1001, and Title 43 U.S.C. Section 1212, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.		

DISTRICT I  
1626 N. FRENCH DR., HOBBES, NM 88240

State of New Mexico  
Energy, Minerals and Natural Resources Department

Form C-102  
Revised October 12, 2003  
Submit to Appropriate District Office  
State Lease - 4 Copies  
Fee Lease - 3 Copies

DISTRICT II  
1301 W. GRAND AVENUE, ARTESIA, NM 88210

OIL CONSERVATION DIVISION  
1220 SOUTH ST. FRANCIS DR.  
Santa Fe, New Mexico 87505

DISTRICT III  
1000 Rio Brazos Rd., Aztec, NM 87410

DISTRICT IV  
1220 S. ST. FRANCIS DR., SANTA FE, NM 87505

WELL LOCATION AND ACREAGE DEDICATION PLAT

☐ AMENDED REPORT

API Number <b>30-025-38611</b>		Pool Code	Pool Name
Property Code	Property Name <b>FEDERAL -11</b>		Well Number <b>8</b>
OGRID No.	Operator Name <b>SAMSON RESOURCES</b>		Elevation <b>3654'</b>

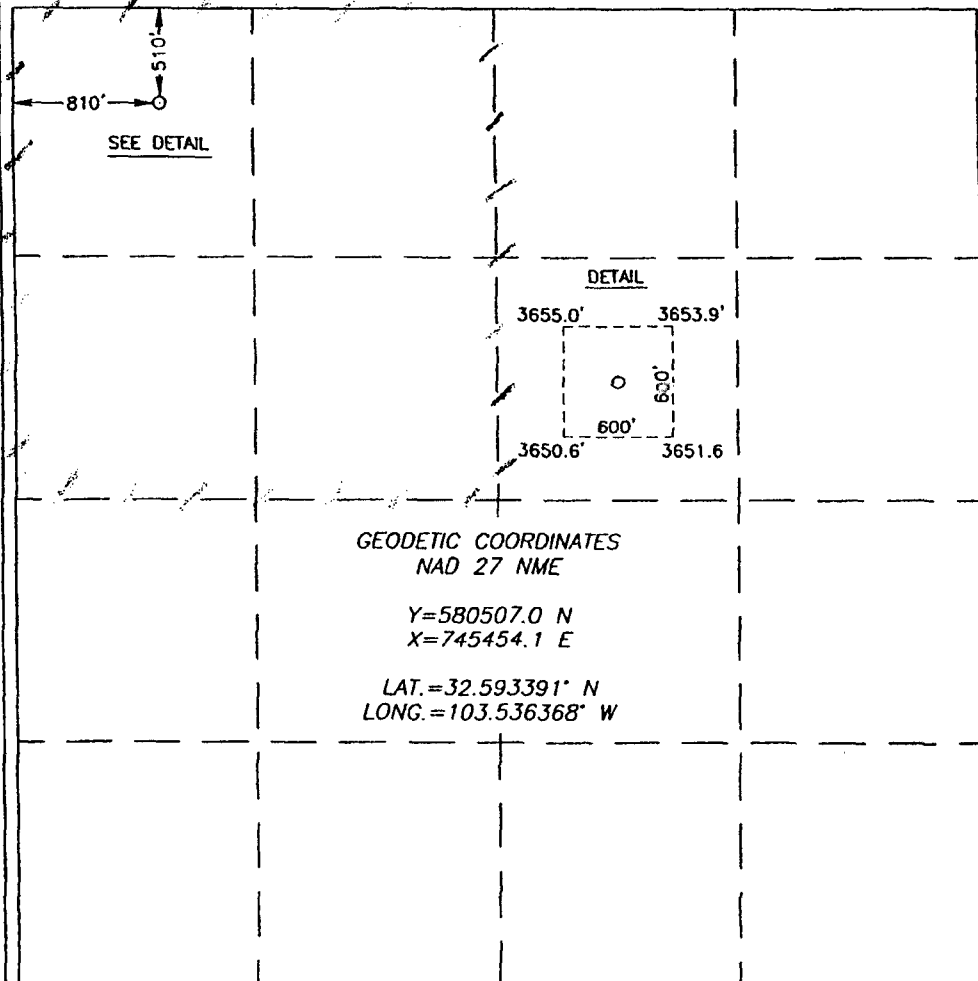
Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	11	20-S	34-E		510	NORTH	810	WEST	LEA

Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres		Joint or Infill	Consolidation Code		Order No.				

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED  
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

 <p>SEE DETAIL</p> <p>DETAIL</p> <p>3655.0' 3653.9'</p> <p>3650.6' 3651.6'</p> <p>600' 600'</p> <p>GEODETIC COORDINATES NAD 27 NME</p> <p>Y=580507.0 N X=745454.1 E</p> <p>LAT.=32.593391° N LONG.=103.536368° W</p>	<p><b>OPERATOR CERTIFICATION</b></p> <p>I hereby certify that the information herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p><i>Duke Roush</i> 11/15/07 Signature Date</p> <p>Duke Roush Printed Name</p>
	<p><b>SURVEYOR CERTIFICATION</b></p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</p> <p>GARY EIDSON Date Surveyed SEPTEMBER 11, 2007 MJN Signature Seal of Professional Surveyor 12641 11/15/07</p> <p>Certificate No. GARY EIDSON 12641</p>

A STRIP OF LAND 50.0 FEET WIDE AND 300.0 FEET OR 0.057 MILES IN LENGTH CROSSING USA LAND IN SECTION 11, TOWNSHIP 20 SOUTH, RANGE 34 EAST, NMPM, LEA COUNTY, NEW MEXICO AND BEING 25.0 FEET LEFT AND 25.0 FEET RIGHT OF THE ABOVE PLATTED CENTERLINE SURVEY.

I HEREBY CERTIFY THAT I DIRECTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR SURVEYING IN NEW MEXICO.



SURVEY OF AN ELECTRIC LINE CROSSING  
SECTION 11, TOWNSHIP 20 SOUTH, RANGE 34 EAST,  
N.M.P.M., LEA COUNTY, NEW MEXICO

Survey Date: 04/03/07	Sheet 1 of 1 Sheets
W.O. Number: 07.11.0433	Drawn By: J.R.
Date: 04/17/07 DISK:CD#7	07110433_ELEC

# APPLICATION FOR DRILLING

SAMSON RESOURCES COMPANY

<b>Federal 11 Well No. 8</b>
660' FNL & 660' FWL, Section 11, T20S, R34E, 510 812 LEA COUNTY, NEW MEXICO
Lease No.: NM-0631
(Development Well)

In conjunction with Form 3160-3, Application for Permit to Drill subject well, Samson Resources Company submits the following items of pertinent information in accordance with BLM requirements:

1. The geologic surface formation is recent Permian with quaternary alluvium and other surficial deposits.
2. The estimated tops of geologic markers are as follows:

Rustler	1600'
Yates	3500'
Seven Rivers	3920'
Delaware Sd	5475'
Bone Spring	8200'
Wolfcamp	11000'
Strawn	12140'
Atoka	12600'
Morrow	13000'

3. The estimated depths at which water, oil or gas formations are anticipated to be encountered:

Water: Surface water between 100' - 300'.  
Oil: Possible in the Delaware 5600' - 6000'.  
Gas: Possible in the Atoka below 12,295' and Morrow 12,830'.

4. Proposed Casing Program:

HOLE SIZE	CASING SIZE	WEIGHT	GRADE	JOINT	SETTING DEPTH	QTY OF CEMENT
17 1/2"	13-3/8"	48.0#	H-40	BT&C	0-1650'	1500 sx
12 1/4"	9-5/8"	40.0#	HCK-55	BT&C	1650-5475'	1250 sx
8 3/4"	5 1/2"	20.0#	P-110	LT&C	5475-13900'	1000 sx

5. Minimum Specifications for Pressure Control Equipment:

SM 5M ~~COM~~ Double Gate BOP over single w/13 5/8" 5M Hydril annular preventer will be installed on the 13-3/8" before drilling 12 1/4" and 8 3/4" holes and operated as a 5000 psi system. Will perform a 3M test on the casing and BOP before drilling 12 1/4" hole and a 5M test before drilling the 8 3/4" hole.



6. MUD PROGRAM:

DEPTH:	DESCR	MUD WEIGHT	VISCOSITY	W/L CONTROL
0-1600'	Fresh water	8.4 ppg		
1600-5400'	Brine water	10.0 ppg		
5400-13900'	Cut Brine/Water	8.7-11.5 ppg		

7. Auxiliary Equipment: Blowout Preventer, flow sensors and stabbing valve.

8. Testing, Logging, and Coring Program:

Drill Stem Tests: None unless conditions warrant.  
Logging: 5,600' to T.D.: CNL-DNL w/GR-Cal. 5,600' to Surface: CNL-GR  
Coring: Rotary sidewall if dictated by logs.

9. No abnormal pressures or temperatures are anticipated. In the event abnormal pressures are encountered the proposed mud program will be modified to increase the mud weight. Estimated evacuated BHP = 5856 psi and surface pressure of 2928 psi with a temperature of 193°.

10. H<sub>2</sub>S: None expected. None in existing wells in close vicinity, but the Mud Log Unit will be cautioned to use a gas trap to detect H<sub>2</sub>S and if any is detected the mud weight will be increased along with H<sub>2</sub>S inhibitors sufficient to control the gas.

11. Anticipated starting date: *August 15, 2007.*

Anticipated completion of drilling operations: *Approximately 6 weeks.*

## MULTI-POINT SURFACE USE AND OPERATIONS PLAN

SAMSON RESOURCES COMPANY

<b>Federal 11 Well No. 8</b>
.660' FNL & .660' FWL, Section 11, T20S, R34E, 510 826 LEA COUNTY, NEW MEXICO
Lease No.: NM-0631
(Development Well)

This plan is submitted with the Application for Permit to Drill the above described well. The purpose of the plan is to describe the location of the proposed well, the proposed construction activities and operations plan, to be followed in rehabilitating the surface environmental effects associated with the operations.

### 1. EXISTING ROADS:

- A. Exhibit "A" is a portion of a USGS/BLM Topo map showing the location of the proposed well as staked. The well site location is approximately 24 road miles southwest of Hobbs, New Mexico. Traveling west from Hobbs there will be approximately 22.5 miles of paved highway and 1.5 mile of gravel ranch/oilfield road.
- B. Directions: From the intersection of U.S. Highway 62/180 and County Road H-27 (Marathon Road), go south on Marathon for 3.1 miles. Turn right (crossing a cattle guard) and go west 1.0 mile. Veer right and go northwest for 0.4 miles. Veer right and go north-northwest for 0.3 miles. This location is approximately 150 feet east of the road.

### 2. PLANNED ACCESS ROAD:

- A. Length and Width: The proposed access road is approximately 2725.8 feet in length and 12 foot in width. The access road is shown on Exhibit "A".
- B. Construction: The proposed access road will be constructed by grading and topping with compacted caliche and will be properly drained.
- C. Turnouts: *As needed.*
- D. Culverts: *As needed.*
- E. Cuts and Fills: Some minor cuts on small dunes as approaching location.
- F. Gates, Cattle guards: *None required.*
- G. Off Lease R/W: *None required.*

### 3. LOCATION OF EXISTING WELLS:

- A. Existing wells within a two-mile radius are shown on Exhibit "C".

### 4. LOCATION OF EXISTING AND/OR PROPOSED FACILITIES:

- A. Samson Resources has production facilities on the lease at this time.
- B. If the well proves to be commercial, the necessary production facilities, gas production-process equipment, and tank battery, if required, will be installed on the drilling pad.

**5. LOCATION AND TYPE OF WATER SUPPLY:**

- A. It is planned to drill the proposed well with fresh water that will be obtained from private or commercial sources and will be transported over the existing and proposed access roads.

**6. SOURCE OF CONSTRUCTION MATERIALS:**

- A. Caliche for the access road and well site pad will be obtained on location, if available, or from an approved private pit. No surface materials will be disturbed except those necessary for actual grading and construction of the drill site and access road.

**7. METHODS OF HANDLING WASTE DISPOSAL:**

- A. Drill cuttings will be disposed of in the reserve pits.
- B. Drilling fluids will be allowed to evaporate in the reserve pits until the pits are dry.
- C. All pits will be fenced with normal fencing materials to prevent livestock and wildlife from entering the area.
- D. Water produced during operations will be collected in tanks until hauled to an approved disposal system, or a separate disposal application will be submitted to the BLM for approval.
- E. Oil produced during operations will be stored in tanks until sold.
- F. Current laws and regulations pertaining to the disposal of human waste will be complied with.
- G. Trash, waste paper, garbage and junk will be contained in trash bins to prevent scattering and will be removed for deposit in an approved sanitary landfill within 30 days after finishing drilling and/or completion operations.

**8. ANCILLARY FACILITIES:**

- A. *None required.*

**9. WELL SITE LAYOUT:**

- A. Exhibit "D" shows the relative location and dimensions of the well pad, reserve pits, and major rig components. The pad and pit area has been staked and flagged 600' X 600'.
- B. Mat Size: 240' X 325', plus 125' X 150' mud pits. The pits will be on the north.
- C. Cut & Fill: *As needed.*
- D. The surface will be topped with compacted caliche and the mud pits will be plastic lined.

**10. PLANS FOR RESTORATION OF THE SURFACE:**

- A. After completion of drilling and/or completion operations, all equipment and other material not required for operations will be removed. Pits will be filled and the location cleaned of all trash and junk to leave the well site in an aesthetically pleasing a condition as possible.
- B. Any unguarded pits containing fluids will be fenced until they are filled.

- C. If the proposed well is non-productive, all rehabilitation and/or vegetation requirements of the Bureau of Land Management will be complied with and will be accomplished as expeditiously as possible. All pits will be filled and leveled as soon as they are dry enough to work after abandonment.

**11. OTHER INFORMATION:**

- A. Topography: The proposed well site and access road is located in an area of 3 - 4 foot sand dunes and deflation basins, which is part of the Querecho Plains. The location has an overall southwest slope of .4% from an elevation of 3652'.
- B. Soil: The topsoil on the well site and access road is light brown colored fine sand. The soil is of the Kermit soils and Dune land series.
- C. Flora and Fauna: The vegetation at the well site is a sparse to fair grass cover of three-awn, dropseed, bluestem, muhly and other miscellaneous native grasses along with plants of mesquite, yucca, sage, shinny oak brush, broomweed, cacti, and miscellaneous weeds and wildflowers. The wildlife consists of rabbits, coyotes, rattlesnakes, lizards, dove, quail and other wildlife typical of the semi-arid desert land.
- D. Ponds and Streams: *None.*
- E. Residences and Other Structures: *None*, but existing oil field facilities.
- F. Land Use: Cattle grazing.
- G. Surface Ownership: The proposed well site and access road are on Federal surface and minerals.
- H. There is no evidence of archaeological, historical or cultural sites in the staked area. Danny Boone is conducting an archaeological survey and their report will be submitted to the appropriate government agencies.

**12. OPERATOR'S REPRESENTATIVE:**

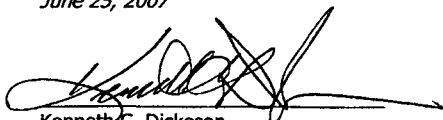
- A. The field representative responsible for assuring compliance with the approved surface use and operations plan is as follows:

**Todd Wiley**  
Samson Resources Company  
Two West Second Street  
Tulsa, OK 74103-3103  
Office Phone: (918) 583-1791

**13. CERTIFICATION:**

*I hereby certify that I have inspected the proposed drill site and access route; that I am familiar with the conditions which presently exist; that the statements made in the plan are, to the best of my knowledge, true and correct; and, that the work associated with the operations proposed herein will be performed by Samson Resources Company and its contractors and subcontractors in conformity with this plan and the terms and conditions under which it is approved. This statement is subject to the provisions of 18 U.S.C. 1001 for the filing of a false statement.*

*June 25, 2007*

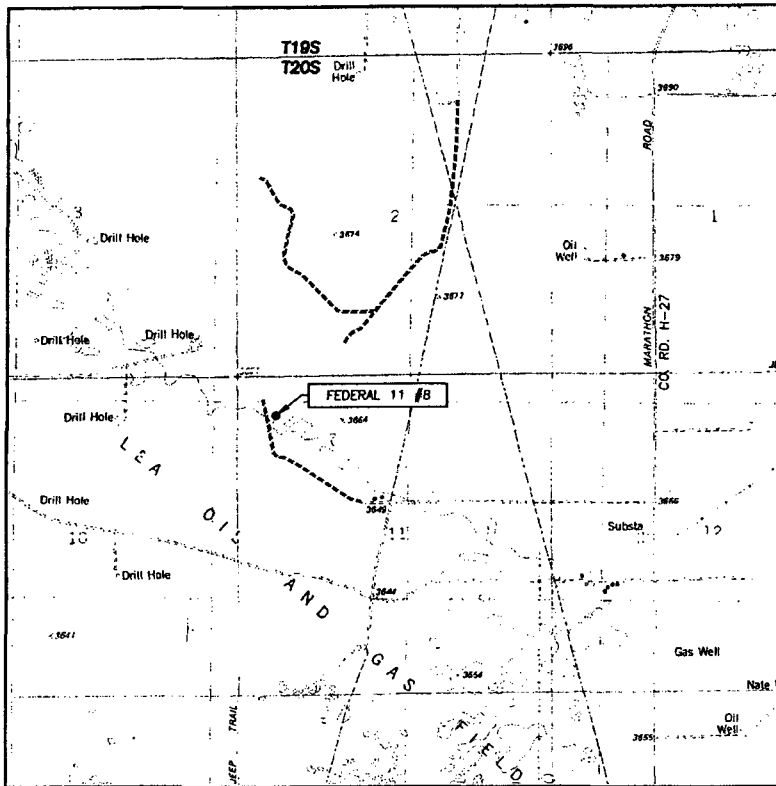


Kenneth C. Dickeson  
Agent for: Samson Resources Company

# EXHIBIT "A"

SAMSON RESOURCES COMPANY

<b>Federal 11 Well No. 8</b>
660' FNL & 660' FWL, Section 11, T20S, R34E, LEA COUNTY, NEW MEXICO
Lease No.: NM-0631
(Development Well)



SCALE: 1" = 2000'

CONTOUR INTERVAL:  
LEA, N.M. - 10'

SEC. 11 TWP. 20-S RGE. 34-E

SURVEY N.M.P.M.

COUNTY LEA STATE NEW MEXICO

DESCRIPTION 660' FNL & 660' FWL

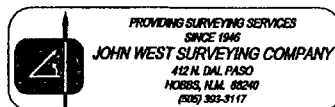
ELEVATION 3652'

OPERATOR SAMSON RESOURCES

LEASE FEDERAL 11

U.S.G.S. TOPOGRAPHIC MAP

LEA, N.M.



SPECIAL DRILLING STIPULATIONS

THE FOLLOWING DATA IS REQUIRED ON THE WELL SIGN

Operator's Name: Samson Resources Company Well Name & #: Federal "11" #8  
 Location 510 F N L & 810 F W L; Sec. 11, T. 20 S., R. 34 E.  
 Lease #: NM-0631 County: Lea State: New Mexico

The Special stipulations check marked below are applicable to the above described well and approval of this application to drill is conditioned upon compliance with such stipulations in addition to the General Requirements. The permittee should be familiar with the General Requirements, a copy of which is available from a Bureau of Land Management office. EACH PERMITTEE HAS THE RIGHT OF ADMINISTRATIVE APPEAL TO THESE STIPULATIONS PURSUANT TO TITLE 43 CFR 3165.3 AND 3165.4.

This permit is valid for a period of one year from the date of approval or until lease expiration or termination whichever is shorter.

I. SPECIAL ENVIRONMENT REQUIREMENTS

- (X) Lesser Prairie Chicken (stips attached) ( ) Flood plain (stips attached)  
 ( ) San Simon Swale (stips attached) ( ) Other

II. ON LEASE - SURFACE REQUIREMENTS PRIOR TO DRILLING

(X) The BLM will monitor construction of this drill site. Notify the ( ) Carlsbad Field Office at (505) 234-5972 (X) Hobbs Office (505) 393-3612, at least 3 working days prior to commencing construction.

( ) Roads and the drill pad for this well must be surfaced with \_\_\_\_\_ inches of compacted caliche upon completion of well and it is determined to be a producer.

( ) All topsoil and vegetation encountered during the construction of the drill site area will be stockpiled and made available for resurfacing of the disturbed area after completion of the drilling operation. Topsoil on the subject location is approximately \_\_\_\_\_ inches in depth. Approximately \_\_\_\_\_ cubic yards of topsoil material will be stockpiled for reclamation.

( ) Other.

III. WELL COMPLETION REQUIREMENTS

( ) A Communitization Agreement covering the acreage dedicated to the well must be filed for approval with the BLM. The effective date of the agreement must be prior to any sales.

(x) Surface Restoration: If the well is a producer, the reserve pit(s) will be backfilled when dry, and cut-and-fill slopes will be reduced to a slope of 3:1 or less. All areas of the pad not necessary for production must be re-contoured to resemble the original contours of the surrounding terrain, and topsoil must be re-distributed and re-seeded with a drill equipped with a depth indicator (set at depth of 1/2 inch) with the following seed mixture, in pounds of Pure Live Seed (PLS), per acre. If broadcasting, the seeding rate must be doubled.

- |   |   |
|---|---|
| ( ) A. Seed Mixture 1 (Loamy Sites)                     | (X) B. Seed Mixture 2 (Sandy Sites)                     |
| Side Oats Grama ( <i>Bouteloua curtipendula</i> ) 5.0   | Sand Dropseed ( <i>Sporobolus cryptandrus</i> ) 1.0     |
| Sand Dropseed ( <i>Sporobolus cryptandrus</i> ) 1.0     | Sand Lovegrass ( <i>Eragrostis trichodes</i> ) 1.0      |
| Plains lovegrass ( <i>Eragrostis intermedia</i> ) 0.5   | Plains Bristlegrass ( <i>Setaria magrostachya</i> ) 2.0 |
| ( ) C. Seed Mixture 3 (Shallow Sites)                   | ( ) D. Seed Mixture 4 (Gypsum Sites)                    |
| Side oats Grama ( <i>Bouteloua curtipendula</i> ) 5.0   | Alkali Sacaton ( <i>Sporobolus airoides</i> ) 1.0       |
| Green Spangletop ( <i>Leptochloa dubia</i> ) 2.0        | Four-Wing Saltbush ( <i>Atriplex canescens</i> ) 5.0    |
| Plains Bristlegrass ( <i>Setaria magrostachya</i> ) 1.0 |   |

( ) OTHER SEE ATTACHED SEED MIXTURE

Seeding should be done either late in the fall (September 15 - November 15, before freeze up, or early as possible the following spring to take advantage of available ground moisture.

Painting Requirement:

All above-ground structures including meter housing that are not subject to safety requirements shall be painted a flat non-reflective paint color, shale green, Munsell Soil Color Chart Number 5Y 4/2.

( ) Other

PRAIRIE CHICKENS

No surface use is allowed during the following time periods; unless otherwise specified, this stipulation does not apply to operation and maintenance of production facilities.

On the lands described below: All of section 11, T. 20 S., R. 34 E.

For the purpose of: Protecting Prairie Chickens:

Drilling for oil and gas, and 3-D geophysical exploration operations will not be allowed in Lesser Prairie Chicken Habitat during the period of March 15 through June 15, each year. During that period, other activities that produce noise or involve human activity, such as the maintenance of oil and gas facilities, geophysical exploration other than 3-D operations, and pipeline, road, and well pad construction, will be allowed except between 3:00 a.m. and 9:00 a.m. The 3:00 a.m. and 9:00 a.m. restriction will not apply to normal, around-the-clock operations, such as venting, flaring, or pumping, which do not require a human presence during the period. Additionally, no new drilling will be allowed within up to 200 meters of leks known at the time of permitting. Normal vehicle use on existing roads will not be restricted. Exhaust noise from pump jack engines must be muffled or otherwise controlled so as not to exceed 75 db measured at 30 feet from the source of the noise.

Bureau of Land Management  
Carlsbad Field Office

SENM-S-22  
December 1997







**JAMES BRUCE**  
ATTORNEY AT LAW

POST OFFICE BOX 1056  
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213  
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)  
(505) 660-6612 (Cell)  
(505) 982-2151 (Fax)

[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

November 16, 2007

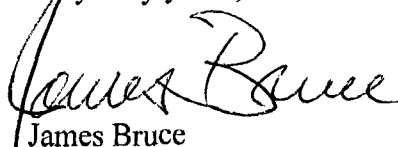
Certified Mail – Return Receipt Requested

Jeff Albers  
Oil, Gas and Minerals Division  
Commissioner of Public Lands  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87501

Ladies and gentlemen:

Samson Resources Company has filed an application with the New Mexico Oil Conservation Division seeking an unorthodox gas well location in the Pennsylvanian formation in the NW¼ of Section 11, Township 20 South, Range 34 East, NMPM, Lea County, New Mexico. A copy of the application is enclosed. If you object to the application, you must notify the Division in writing no later than 20 days from the date of this letter (the Division's address is 1220 South St. Francis Drive, Santa Fe, New Mexico 87505). Failure to object will preclude you from contesting this matter at a latter date.

Very truly yours,



James Bruce

Attorney for Samson Resources Company

EXHIBIT

C

Submit To Appropriate District Office State Lease - 6 copies Fee Lease - 5 copies <b>District I</b> 1625 N. French Dr., Hobbs, NM 88240 <b>District II</b> 1301 W. Grand Avenue, Artesia, NM 88210 <b>District III</b> 1000 Rio Brazos Rd., Aztec, NM 87410 <b>District IV</b> 1220 S. St. Francis Dr., Santa Fe, NM 87505	<b>State of New Mexico</b> <b>Energy, Minerals and Natural Resources</b>  <b>Oil Conservation Division</b> <b>1220 South St. Francis Dr.</b> <b>Santa Fe, NM 87505</b>	<b>Form C-105</b> Revised June 10, 2003  WELL API NO. 30-025-37453  5. Indicate Type of Lease STATE <input checked="" type="checkbox"/> FEE <input type="checkbox"/>  State Oil & Gas Lease No. 35083																																				
<b>WELL COMPLETION OR RECOMPLETION REPORT AND LOG</b>																																						
1a. Type of Well: OIL WELL <input type="checkbox"/> GAS WELL <input checked="" type="checkbox"/> DRY <input type="checkbox"/> OTHER _____ b. Type of Completion: NEW <input checked="" type="checkbox"/> WORK <input type="checkbox"/> DEEPEN <input type="checkbox"/> PLUG <input type="checkbox"/> DIFF. WELL <input type="checkbox"/> OVER BACK RESVR. <input type="checkbox"/> OTHER		7. Lease Name or Unit Agreement Name <b>Eagle 2 State</b>																																				
2. Name of Operator <b>Samson Resources Company</b>		8. Well No. <b>1</b>																																				
3. Address of Operator <b>Two West Second St.</b> <b>Tulsa, OK 74103 ATTN: Kathy Staton</b>		9. Pool name or Wildca Lea Penn Gas #80040																																				
4. Well Location Unit Letter <u>O</u> : <u>660</u> Feet From The <u>south</u> Line and <u>1600</u> Feet From The <u>east</u> Line Section <u>2</u> Township <u>20S</u> Range <u>34E</u> NMPM Lea County																																						
10. Date Spudded 10/3/05	11. Date T.D. Reached 11/17/05	12. Date Compl. (Ready to Prod.) 3/16/06																																				
13. Elevations (DF& RKB, RT, GR, etc.) 3667' GL		14. Elev. Casinghead																																				
15. Total Depth 13650'	16. Plug Back T.D. 13595'	17. If Multiple Compl. How Many Zones? 18. Intervals Drilled By Rotary Tools 0-TD Cable Tools																																				
19. Producing Interval(s), of this completion - Top, Bottom, Name <b>12,732'-NDE Morrow</b>		20. Was Directional Survey Made no																																				
21. Type Electric and Other Logs Run SDL/DSN; DLL/MGRD		22. Was Well Cored no																																				
23. <b>CASING RECORD (Report all strings set in well)</b> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>CASING SIZE</th> <th>WEIGHT LB/FT.</th> <th>DEPTH SET</th> <th>HOLE SIZE</th> <th>CEMENTING RECORD</th> <th>AMOUNT PULLED</th> </tr> </thead> <tbody> <tr> <td>13.375"</td> <td>61.00#</td> <td>1576'</td> <td>17.50"</td> <td>1725 sx</td> <td></td> </tr> <tr> <td>9.625"</td> <td>40.00#</td> <td>5555'</td> <td>12.250"</td> <td>1345 sx</td> <td></td> </tr> <tr> <td>5.500"</td> <td>20.00#</td> <td>13650'</td> <td>8.750"</td> <td>1875 sx</td> <td></td> </tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>			CASING SIZE	WEIGHT LB/FT.	DEPTH SET	HOLE SIZE	CEMENTING RECORD	AMOUNT PULLED	13.375"	61.00#	1576'	17.50"	1725 sx		9.625"	40.00#	5555'	12.250"	1345 sx		5.500"	20.00#	13650'	8.750"	1875 sx													
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26. Perforation record (interval, size, and number) 13,270' - 13,476' w/57 shots																																						
27. ACID, SHOT, FRACTURE, CEMENT, SQUEEZE, ETC. <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>DEPTH INTERVAL</th> <th>AMOUNT AND KIND MATERIAL USED</th> </tr> </thead> <tbody> <tr> <td>13469-76'</td> <td>Brkdns w/50 bbls 4% KCL</td> </tr> <tr> <td>13270-13476'</td> <td>Acid w/2000 gals acid &amp; 3832 gals 6% KCL</td> </tr> <tr> <td>13270-13476'</td> <td>Frac w/55,000# prop. 499 bbls fluid 172 tons CO2</td> </tr> </tbody> </table>			DEPTH INTERVAL	AMOUNT AND KIND MATERIAL USED	13469-76'	Brkdns w/50 bbls 4% KCL	13270-13476'	Acid w/2000 gals acid & 3832 gals 6% KCL	13270-13476'	Frac w/55,000# prop. 499 bbls fluid 172 tons CO2																												
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<b>28. PRODUCTION</b>																																						
Date First Production 1/13/06		Production Method (Flowing, gas lift, pumping - Size and type pump) flowing																																				
Well Status <b>Producing</b>																																						
Date of Test 4/4/06	Hours Tested 24	Choke Size 18/64"																																				
Prod'n For Test Period	Oil - Bbl 47.5	Gas - MCF 875																																				
Water - Bbl. 10	Gas - Oil Ratio 18,421																																					
Flow Tubing Press. 400	Casing Pressure 0	Calculated 24-Hour Rate																																				
Oil - Bbl.	Gas - MCF	Water - Bbl.																																				
Oil Gravity - API - (Corr.) 48.9																																						
29. Disposition of Gas (Sold, used for fuel, vented, etc.) <b>SOLD</b>																																						
30. List Attachments <b>Deviation Report; Set of Logs</b>																																						
EXHIBIT <b>D</b>																																						
31. I hereby certify that the information shown on both sides of _____ ledge and belief																																						
Signature <u>Randal L. Maxwell</u>		Printed Name <u>Randal L. Maxwell</u>																																				
Title <u>Regulatory Engineer</u>		Date <u>4/10/06</u>																																				
E-mail Address <u>kstaton@samson.com</u>																																						

**Well File Search - Select API Number to View**

Please select the API Number you wish to view from the list below by clicking the radio button next to the API Number. Then click the "Continue" button to see the thumbnails for the API you selected.

The search results are broken out by groups of 25 on each page. Switching pages can be done by clicking the "Next 25" or "Previous 25" links.

21 Records Found

Displaying Screen 1 of 1

API Number	ULSTR	Footages
<input type="radio"/> 3002520332	C -2-20S-34E	330 FNL & 2080 FWL
Well Name & Number: PRE-ONGARD WELL No. 001		
Operator: PRE-ONGARD WELL OPERATOR		
<input type="radio"/> 3002523520	B -2-20S-34E	660 FNL & 1980 FEL
Well Name & Number: PRE-ONGARD WELL No. 001		
Operator: PRE-ONGARD WELL OPERATOR		
<input type="radio"/> 3002528583	A -2-20S-34E	660 FNL & 550 FEL
Well Name & Number: WEST PEARL STATE No. 001		
Operator: ARMSTRONG ENERGY CORP		
<input type="radio"/> 3002529204	J -2-20S-34E	1980 FSL & 1980 FEL
Well Name & Number: MOBIL STATE No. 001		
Operator: PETROHAWK OPERATING COMPANY		
<input type="radio"/> 3002529689	H -2-20S-34E	2300 FNL & 560 FEL
Well Name & Number: PRE-ONGARD WELL No. 002		
Operator: PRE-ONGARD WELL OPERATOR		
<input type="radio"/> 3002529701	N -2-20S-34E	660 FSL & 1980 FWL
Well Name & Number: PRE-ONGARD WELL No. 002		
Operator: PRE-ONGARD WELL OPERATOR		
<input type="radio"/> 3002529714	H -2-20S-34E	2302 FNL & 610 FEL
Well Name & Number: PRE-ONGARD WELL No. 002Y		
Operator: PRE-ONGARD WELL OPERATOR		
<input type="radio"/> 3002531696	K -2-20S-34E	1800 FSL & 1980 FWL
Well Name & Number: MOBIL LEA STATE No. 001		
Operator: ARMSTRONG ENERGY CORP		
<input type="radio"/> 3002531845	G -2-20S-34E	2310 FNL & 2210 FEL
Well Name & Number: WEST PEARL STATE No. 002		
Operator: ARMSTRONG ENERGY CORP		
<input type="radio"/> 3002531928	L -2-20S-34E	1800 FSL & 990 FWL
Well Name & Number: MOBIL LEA STATE No. 002		
Operator: ARMSTRONG ENERGY CORP		
<input type="radio"/> 3002532105	M -2-20S-34E	990 FSL & 870 FWL
Well Name & Number: MOBIL LEA STATE No. 003		
Operator: ARMSTRONG ENERGY CORP		
<input type="radio"/> 3002532310	N -2-20S-34E	1155 FSL & 1770 FWL
Well Name & Number: MOBIL LEA STATE No. 004		
Operator: ARMSTRONG ENERGY CORP		
<input type="radio"/> 3002532466	E -2-20S-34E	2440 FNL & 870 FWL
Well Name & Number: MOBIL LEA STATE No. 005		

Dlw

Dlw

Dlw

Dlw

Dlw

~~Operator: ARMSTRONG ENERGY CORP~~

☐ 3002532914 ~~E -2-20S-34E~~ 1930 FNL & 330 FWL

~~Well Name & Number: MOBIL LEA STATE No. 007~~

~~Operator: ARMSTRONG ENERGY CORP~~

☐ 3002535962 N -2-20S-34E 330 FSL & 1650 FWL

Well Name & Number: MOBIL LEA STATE No. 008

Operator: ARMSTRONG ENERGY CORP

☐ 3002537453 O -2-20S-34E 660 FSL & 1600 FEL

Well Name & Number: EAGLE 2 STATE No. 001

Operator: SAMSON RESOURCES CO

☐ 3002537863 L -2-20S-34E 1980 FSL & 660 FWL

Well Name & Number: EAGLE 2 STATE No. 002

Operator: SAMSON RESOURCES CO

☐ 3002538041 F -2-20S-34E 2310 FNL & 2310 FWL

Well Name & Number: EAGLE 2 STATE No. 004F

Operator: SAMSON RESOURCES CO

☐ 3002538042 F -2-20S-34E 1980 FNL & 2130 FWL

Well Name & Number: EAGLE 2 STATE No. 003

Operator: SAMSON RESOURCES CO

☐ 3002538451 N -2-20S-34E 580 FSL & 2105 FWL

Well Name & Number: EAGLE 2 STATE No. 005

Operator: SAMSON RESOURCES CO

☐ 3002538622 D -2-20S-34E 660 FNL & 660 FWL

Well Name & Number: EAGLE 2 STATE No. 004

Operator: SAMSON RESOURCES CO

21 Records Found

Displaying Screen 1 of 1

Continue

Go Back

**Brooks, David K., EMNRD**

---

**From:** James Bruce [jamesbruc@aol.com]  
**Sent:** Tuesday, January 08, 2008 7:20 AM  
**To:** Brooks; David K.; Brooks, David K., EMNRD  
**Subject:** RE: Samson Federal 11 #8 - NSL Application

David ... The s/2 is a single state lease, and samson owns 100 percent of the working interest. I just found out that a samson well in the se/4 (the no. 2, i think) originally permitted as a bone spring well, was recently completed in the morrow (lea penn), so there is a direct offset producer.

I'm out of town for a few days, and can confirm when i get back.

Jim

-----Original Message-----

From: "Brooks, David K., EMNRD" <david.brooks@state.nm.us>  
To: "JamesBruc@aol.com" <JamesBruc@aol.com>  
Sent: 1/7/2008 6:09 PM  
Subject: Samson Federal 11 #8 - NSL Application

Dear Jim

I have before me the referenced application.

You state that there is an offsetting well to the North of the proposed location, in S/2 of Section 2. That appears to be correct, and that well is Samson's Eagle 2 State Well No. 1. This is not the offsetting unit on 160 acre spacing, since that well is in Unit O. It does seem to be under the same State lease, however.

What I need to know is whether Samson owns 100% of the working interest in the SW/4 of Section 2, and, if not, whether working interest ownership in the SW/4 of Section 2 is identical to that in the NW/4 of Section 11. Unless one of these conditions exists, notice to working interest owners in the SW/4 of Section 2 would be required.

Please advise.

Sincerely

David

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This inbound email has been scanned by the MessageLabs Email Security System.

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**Brooks, David K., EMNRD**

---

**From:** Brooks, David K., EMNRD  
**Sent:** Wednesday, January 09, 2008 11:04 AM  
**To:** 'James Bruce'  
**Subject:** Samson Federal 11 #8

Dear Jim

I encountered an unexpected obstacle in writing this NSL. The Lea Pennsylvanian Pool is not listed in Byram's index of special pool rules. I have no reason to doubt that it is spaced on 160 because the various pool extension orders are consistent with that. But I cannot find the applicable order.

If I find the order before I return, I will go ahead and write the approval. If not, I need help locating it.

Thanks

David

1/9/2008

January 9, 2008

Mr. David Brooks  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, New Mexico 87505

RECEIVED  
2008 JAN 11 PM 2 16

Enclosed please find the proof of notice for the simultaneous dedication & unorthodox gas well location application that was recently filed by EnerVest Operating, L.L.C. for the State "A" Com No. 8 located in Unit X of Irregular Section 5, T-21 South, Range 36 East, NMPM, Lea County, New Mexico

Ronnie L. Young  
EnerVest Operating L.L.C.  
1001 Fannin Street  
Suite 800  
Houston, Texas 77002-6707

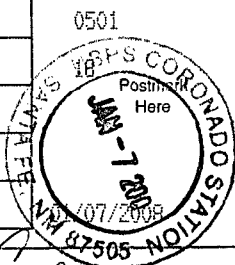


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Restricted Delivery Fee (Endorsement Required)	\$ 0.00
<b>Total Postage &amp; Fees</b>	<b>\$ 5.94</b>



Sent To *Conoco Phillips Company*  
 Street, Apt. No., or PO Box No. *Box 2197 UL 3 6106*  
 City, State, ZIP+4 *Houston, Texas 77252-2197*

PS Form 3800, August 2006

See Reverse for Instructions

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TULSA OK 74121

Postage	\$ 1.14
Certified Fee	\$ 2.65
Return Receipt Fee (Endorsement Required)	\$ 2.15
Restricted Delivery Fee (Endorsement Required)	\$ 0.00
<b>Total Postage &amp; Fees</b>	<b>\$ 5.94</b>



Sent To *BP America Production Company*  
 Street, Apt. No., or PO Box No. *Box 22048*  
 City, State, ZIP+4 *Tulsa, Oklahoma 74121*

PS Form 3800, August 2006

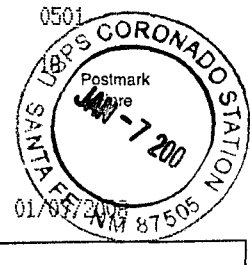
See Reverse for Instructions

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MIDLAND TX 79701

Postage	\$ 1.14
Certified Fee	\$ 2.65
Return Receipt Fee (Endorsement Required)	\$ 2.15
Restricted Delivery Fee (Endorsement Required)	\$ 0.00
<b>Total Postage &amp; Fees</b>	<b>\$ 5.94</b>



Sent To *XTO Energy, Inc.*  
 Street, Apt. No., or PO Box No. *200 N. Lorraine Suite 800*  
 City, State, ZIP+4 *Midland, Texas 79701*

PS Form 3800, August 2006

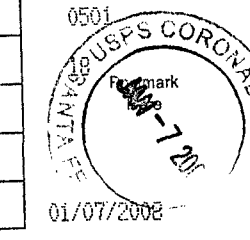
See Reverse for Instructions

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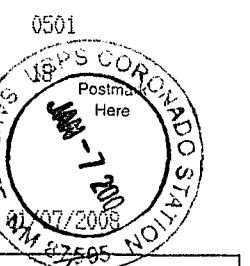
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**Brooks, David K., EMNRD**

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**From:** Brooks, David K., EMNRD  
**Sent:** Monday, February 04, 2008 10:58 AM  
**To:** Arrant, Bryan, EMNRD  
**Subject:** Samson Resources Federal 11 #8

Bryan

I left a phone message for you, but since I did not reach you, here is my question.

This is a request for a Morrow well in the Lea Pennsylvanian Gas Pool (11-20S-34E). They propose a 160-acre NW/4 unit.

Of course, this would be 320-acre spacing under statewide rules, and there are no pool rules. However, Jim Bruce has correctly pointed out that at the time the Lea Pennsylvanian Gas Pool was created, statewide rules provided for 160-acre spacing. I have also found Order R-2707 which apparently first adopted 320-acre spacing for deep gas in the SE. The version of Rule 104 adopted in that order preserved 160-acre spacing in existing pools spaced on 160. Then in order R-7830-A, the Lea-Pennsylvanian pool was confined to its boundaries, the order recognizing that it was spaced on 160, while surrounding pools were spaced on 320.

The problem is that the current version of rule 104 does not contain the language adopted in R-2707 that preserves 160-acre spacing as to pre-existing pools. I guess if we are still treating the Lea-Pennsylvanian Pool as spaced on 160 acres per Orders R-2707 and R-7830-A, there is no reason not to continue to do so, and this approval should be issued, even though I cannot find an order that actually provides for this. Of course, there may be an order I do not know about. Specifically, I have not been able to find the order that adopted the present version of Rule 104.

Please give me the benefit of your thoughts on this.

David Brooks

2/4/2008

**Brooks, David K., EMNRD**

---

**From:** Brooks, David K., EMNRD  
**Sent:** Tuesday, January 08, 2008 8:38 AM  
**To:** 'James Bruce'  
**Subject:** RE: Samson Federal 11 #8 - NSL Application

Dear Jim

Based on your representation that Samson owns 100% of the working interest in the S/2 of Section 2, I will go ahead and write this one.

Thanks

David Brooks

-----Original Message-----

From: James Bruce [mailto:jamesbruc@aol.com]  
Sent: Tuesday, January 08, 2008 7:20 AM  
To: Brooks; David K.; Brooks, David K., EMNRD  
Subject: RE: Samson Federal 11 #8 - NSL Application

David ... The s/2 is a single state lease, and samson owns 100 percent of the working interest. I just found out that a samson well in the se/4 (the no. 2, i think) originally permitted as a bone spring well, was recently completed in the morrow (lea penn), so there is a direct offset producer.

I'm out of town for a few days, and can confirm when i get back.

Jim

-----Original Message-----

From: "Brooks, David K., EMNRD" <david.brooks@state.nm.us>  
To: "JamesBruc@aol.com" <JamesBruc@aol.com>  
Sent: 1/7/2008 6:09 PM  
Subject: Samson Federal 11 #8 - NSL Application

Dear Jim

I have before me the referenced application.

You state that there is an offsetting well to the North of the proposed location, in S/2 of Section 2. That appears to be correct, and that well is Samson's Eagle 2 State Well No. 1. This is not the offsetting unit on 160 acre spacing, since that well is in Unit O. It does seem to be under the same State lease, however.

What I need to know is whether Samson owns 100% of the working interest in the SW/4 of Section 2, and, if not, whether working interest ownership in the SW/4 of Section 2 is identical to that in the NW/4 of Section 11. Unless one of these conditions exists, notice to working interest owners in the SW/4 of Section 2 would be required.

Please advise.

Sincerely

David

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**Brooks, David K., EMNRD**

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**From:** Brooks, David K., EMNRD  
**Sent:** Monday, January 07, 2008 6:10 PM  
**To:** 'JamesBruc@aol.com'  
**Subject:** Samson Federal 11 #8 - NSL Application

Dear Jim

I have before me the referenced application.

You state that there is an offsetting well to the North of the proposed location, in S/2 of Section 2. That appears to be correct, and that well is Samson's Eagle 2 State Well No. 1. This is not the offsetting unit on 160 acre spacing, since that well is in Unit O. It does seem to be under the same State lease, however.

What I need to know is whether Samson owns 100% of the working interest in the SW/4 of Section 2, and, if not, whether working interest ownership in the SW/4 of Section 2 is identical to that in the NW/4 of Section 11. Unless one of these conditions exists, notice to working interest owners in the SW/4 of Section 2 would be required.

Please advise.

Sincerely

David

1/7/2008

**Brooks, David K., EMNRD**

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**From:** Kautz, Paul, EMNRD  
**Sent:** Monday, February 04, 2008 6:40 PM  
**To:** Arrant, Bryan, EMNRD; Mull, Donna, EMNRD; Brooks, David K., EMNRD  
**Subject:** RE: Samson Resources Federal 11 #8

David

The Lea;Penn (gas) pool does have special pool rules. These special pool rules were created by R-2707 also R-7830-A confirms that wells within the boundry of the Lea pool are on 160 acrea.

Paul KAUTZ

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**From:** Arrant, Bryan, EMNRD  
**Sent:** Mon 2/4/2008 2:30 PM  
**To:** Kautz, Paul, EMNRD; Mull, Donna, EMNRD  
**Subject:** FW: Samson Resources Federal 11 #8

David,  
I have sent this e mail inquiry to Donna and Paul as this well location lies in District 1.

See ya,  
*Bryan G. Arrant*  
District II Geologist  
New Mexico Oil Conservation Division  
1301 West Grand Ave.  
Artesia, NM 88210  
505-748-1283 Ext. 103

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**From:** Brooks, David K., EMNRD  
**Sent:** Monday, February 04, 2008 10:58 AM  
**To:** Arrant, Bryan, EMNRD  
**Subject:** Samson Resources Federal 11 #8

Bryan

I left a phone message for you, but since I did not reach you, here is my question.

This is a request for a Morrow well in the Lea Pennsylvanian Gas Pool (11-20S-34E). They propose a 160-acre NW/4 unit.

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The problem is that the current version of rule 104 does not contain the language adopted in R-2707 that

2/5/2008

5/25/64

7/3/85

preserves 160-acre spacing as to pre-existing pools. I guess if we are still treating the Lea-Pennsylvanian Pool as spaced on 160 acres per Orders R-2707 and R-7830-A, there is no reason not to continue to do so, and this approval should be issued, even though I cannot find an order that actually provides for this. Of course, there may be an order I do not know about. Specifically, I have not been able to find the order that adopted the present version of Rule 104.

Please give me the benefit of your thoughts on this.

David Brooks

2/5/2008