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 A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 15,659

APPLICATION OF GMT EXPLORATION COMPANY LLC FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 15,660

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by BTA Oil Producers, LLC as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

GMT Exploration Company LLC

APPLICANT'S ATTORNEY

James Bruce

OPPONENT

Black Mountain Operating LLC

OPPONENT'S ATTORNEY

J. Scott Hall Seth McMillan

OTHER PARTY

BTA Oil Producers, LLC 104 South Pecos Midland, Texas 79701

Attention:

Kent Christensen

(432) 682-3753

OTHER PARTY'S ATTORNEY

James Bruce P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

STATEMENT OF THE CASE

APPLICANT

Case No. 15659: GMT Exploration Company LLC seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the W/2W/2 of Section 2, Township 22 South, Range 34 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard unit (project area). The unit will be dedicated to the Pucker Rapid State Com. Well No. 1H, a horizontal well with a surface location in the SW/SW/4, and a terminus in the NW/4NW/4, of Section 2. The beginning and end of the productive interval will be orthodox. 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.

Case No. 15660: GMT Exploration Company LLC seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the E/2W/2 of Section 2, Township 22 South, Range 34 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard unit (project area). The unit will be dedicated to the Squeeze State Com. Well No. 1H, a horizontal well with a surface location in the SE/SW/4, and a terminus in the NE/4NW/4, of Section 2. The beginning and end of the productive interval will be orthodox. 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

OTHER PARTY

BTA Oil Producers, LLC, an interest owner in this area, requests that the Division approve the above applications.

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS

OPPONENT

WITNESSES EST. TIME EXHIBITS

OTHER PARTY

WITNESSES

EST. TIME

EXHIBITS

Kent Christensen (landman)

15 min.

Approx. 2

PROCEDURAL MATTERS

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for bta Oil Producers, LLC