

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)

jamesbruce@aol.com

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October 31, 2005

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

Case 13596

Dear Florene:

Enclosed for filing, on behalf of Samson Resources Company, are an original and one copy of an application for compulsory pooling, together with a proposed advertisement. The advertisement has also been e-mailed to the Division. The parties being pooled are listed on Exhibit A. Please set this matter for the December 1, 2005 Examiner hearing. Thanks.

Very truly yours,


James Bruce

Attorney for Samson Resources Company

EXHIBIT A

<u>Working Interest Owner</u>	<u>Working Interest Before Payout</u>	<u>Working Interest After Payout</u>
Samson Resources Company Two West Second Street Tulsa, OK 74103	51.8234%	49.1127%
Desert Rainbow LLC P.O. Box 1837 Roswell, NM 88202	6.1742%	5.2706%
Merit Energy Company Suite 501 13727 Noel Road Dallas, TX 75240	-0-	3.6144%
Pure Resources, LP 500 W. Illinois Midland, TX 79701	0.4261%	0.4261%
Ownership Uncertain: ConocoPhillips Company P.O. Box 2197 Houston, TX 77252 Attention: Linda Hicks Delmar Holdings, LP Suite 801 16607 Blanco Road San Antonio, TX 78232 OBO, Inc. P.O. Box 298 Roswell, NM 88202 Custer & Wright P.O. Box 2334 Midland, TX 79702	4.4484%	4.4484%
A.W. Dugan Suite 3100 1415 Louisiana Street Houston, TX 77002	3.4801%	3.4801%

Edge Petroleum Exploration Company Suite 2000 1301 Travis Houston, TX 77002	15.6250%	15.6250%
Pure Energy Group Inc. Suite 1925 700 N. St. Mary Street San Antonio, TX 78205	7.8125%	7.8125%
Chisos Ltd. 670 Dona Ana Road SW Deming, NM 88030	7.8125%	7.8125%
William W. Saunders 606 Ridgemont San Antonio, TX 78209	2.0709%	2.0709%
Todd M. Wilson 3608 So. County Road 1184 Midland, TX 79701	0.1065%	0.1065%
Roger T. Elliott 3907 Crestgate Midland, TX 79707	0.1065%	0.1065%
Betty F. Hayes c/o Stephen Hayes DHR International, Inc. 5335 Wisconsin Avenue NW Washington, DC 20015	0.0650%	0.0650%
Kelly H. Baxter P.O. Box 1649 Austin, TX 78767	0.0325%	0.0325%
Carol Day 1007 Sylvan Meadows Drive Modesto, CA 95356	0.0108%	0.0108%
Fred T. Newcomb No. 10 15012 Lemoli Drive Gardena, California 90249	0.01083%	0.01083%

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

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

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Case No. 13596

APPLICATION

Samson Resources Company applies for an order pooling all mineral interests from 4000 to 13693 feet subsurface underlying the S½ of Section 15, Township 20 South, Range 33 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

1. Applicant is an interest owner in the S½ of Section 15, and has the right to drill a well thereon.
2. Applicant proposes to drill its Bandit "15" Fed. Well No. 2, at an orthodox location in the NW¼SE¼ of Section 15, to a depth sufficient to test the Morrow formation, and seeks to dedicate the following acreage to the well:
 - (a) The SE¼ to form a standard 160 acre gas spacing and proration unit for any formations and/or pools developed on 160-acre spacing within that vertical extent; and
 - (b) The S½ to form a 320 acre gas spacing and proration unit for any formations and/or pools developed on 320 acre spacing within that vertical extent, including the Undesignated Teas-Pennsylvanian Gas Pool.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the S½ of Section 15 for the purposes set forth herein.
4. Although applicant attempted to obtain voluntary agreements from all mineral 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 interest owners in the S½ of Section 15, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral interests underlying the S½ of Section 15 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 interests in the S½ of Section 15, from 4000 to 13693 feet subsurface;
- B. Designating applicant as operator of the well;
- C. Considering the cost of drilling and completing the well, and allocating the cost 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,



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

Attorney for Samson Resources Company

PROPOSED ADVERTISEMENT

Case No. 13596: Application of Samson Resources Company for compulsory pooling, Lea County, New Mexico: Samson Resources Company seeks an order pooling all mineral interests from 4000 to 13,693 feet subsurface underlying the following described acreage in Section 15, Township 20 South, Range 33 East, NMPM, Lea County, New Mexico, and in the following manner: The S/2 to form a standard 320-acre gas spacing and proration unit for any and all formations or pools developed on 320-acre spacing within that vertical extent, including the Undesignated Teas-Pennsylvanian Gas Pool; and the SE/4 to form a standard 160-acre gas spacing and proration unit for any and all formations or pools developed on 160-acre spacing within that vertical extent. The units are to be designated to the Bandit "15" Federal Well No. 2, to be located at an orthodox well location in the NW/4SE/4 of Section 15. 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. The units are located approximately 5-1/2 miles east-northeast of Halfway, New Mexico.

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