

**KAREN AUBREY**

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November 22, 2017

Florene Davidson  
Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505  
VIA: florene.davidson@state.nm.us

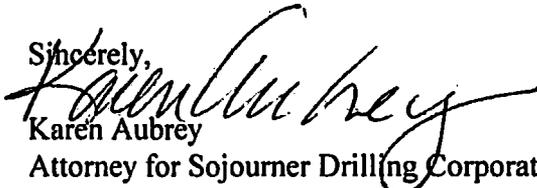
Re: Case 15873

Application of Sojourner Drilling Corporation for Compulsory Pooling,  
Curry County, New Mexico

Dear Florene:

Attached for filing is the Applicant's Pre-Hearing Statement in the above case.

Sincerely,

  
Karen Aubrey

Attorney for Sojourner Drilling Corporation

ka/pjg

enclosure

xc: Linda Powell

Evelyn B. Wallace Richter, Co-Trustee  
Travis Walne, Northern Trust, Co-Trustee  
Robert Key

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: Case No. 15873  
APPLICATION OF SOJOURNER DRILLING  
CORPORATION FOR COMPULSORY POOLING,  
CURRY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Sojourner Drilling Corporation  
810 Anson, Avenue  
Abilene, TX 79601  
Attn: Elma Bernal

APPLICANT'S ATTORNEY

Karen Aubrey  
P.O. Box 8435  
Santa Fe, NM 87504  
(505) 982-4287  
ka@karenaubreylaw.com

OPPONENT

Linda Powell  
P.O. Box 605  
Plains, TX 79355

OPPONENT'S ATTORNEY

Trust u/w/o EVELYN G. BROWN  
FBO EVELYN B. WALLACE RICHTER  
The Northern Trust Company and  
Evelyn B. Richter Co-Trustees  
250 Sandpiper Drive  
Palm Beach, FL 33480

Trust u/w/o ALGERNON W. BROWN  
FBO EVELYN B. WALLACE RICHTER  
The Northern Trust Company and  
Evelyn B. Richter Co-Trustees  
250 Sandpiper Drive  
Palm Beach, FL 33480

Iris L. Bradley Vice President/ Travis Walne  
Oil, Gas and Minerals Manager  
Northern Trust  
16475 Dallas Parkway  
Addison, TX 75001

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order pooling all mineral interests in the Canyon formation underlying the NE/4 of Section 34, Township 6 North, Range 34 East, NMPM, for all pools or formations developed on 160 acre spacing within the vertical extent, including the WC0009 No. 63434G, Canyon Gas Pool. The unit will be dedicated to the Frio Lands #1 Well, a vertical well with a surface location 1929 FNL and 1962 FEL of Section 34. 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 spacing unit is located approximately 20 miles north of Clovis, New Mexico.

OPPONENT:

PROPOSED EVIDENCE

APPLICANT:

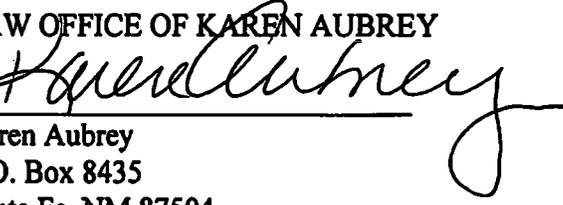
<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Robert Key (Landman)	15 minutes	Approx. 6
James Gilbert (Geology)	15 minutes	Approx. 4

OPPONENT:

PROCEDURAL MATTERS

Respectfully submitted,

LAW OFFICE OF KAREN AUBREY

By 

Karen Aubrey

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Attorney for Applicant