

**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 SOJOURNER DRILLING
CORPORATION FOR COMPULSORY POOLING,
CURRY COUNTY, NEW MEXICO.**

Case No. 15873

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by (1) Linda Powell, and (2) The Northern Trust Company, Co-Trustee of the Evelyn Richter Trusts under the wills of Algernon W. Brown and Evelyn G. Brown, as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Sojourner Drilling Corporation

OPPONENT

The Northern Trust Company
Dallas, Texas

Linda Powell
Plains, Texas

APPLICANT'S ATTORNEY

Karen Aubrey

OPPONENT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com

STATEMENT OF THE CASE

APPLICANT

Sojourner Drilling Corporation ("Sojourner") seeks an order pooling the Canyon formation underlying the NE/4 of Section 34, Township 6 North, Range 34 East, NMPM.

OPPONENT

Opponents are unleased mineral interest owners in the NE/4 of Section 6. Opponents assert that Sojourner has not satisfied the Division's requirements to file a pooling application, and requests that the application be denied.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENTS

WITNESSES

EST. TIME

EXHIBITS

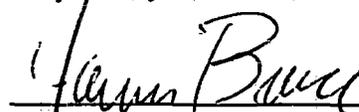
Robert Bell
(landman)

30 min.

Approx. 12

PROCEDURAL MATTERS

Respectfully submitted,



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

Attorney for Linda Powell, and The
Northern Trust Company, Co-Trustee of the
Evelyn Richter Trusts under the wills of
Algernon W. Brown and Evelyn G. Brown

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following
counsel of record this 22nd day of November, 2017 by e-mail:

Karen Aubrey
ka@karenaubreyllaw.com



James Bruce