

**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. 13730

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

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

<u>APPLICANT</u>	<u>ATTORNEY</u>	
Samson Resources Company Attention: Rita Buress Two West Second Street Tulsa, OK 74103-3103 (918) 591-1791	Ocean Munds-Dry, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421	2006 MAY 31 PM 3 16

STATEMENT OF CASE

APPLICANT

Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Morrow formation in the following described spacing and proration units located in the S/2 of Section 12, Township 20 South, Range 33 East, N.M.P.M., Lea County, New Mexico: the S/2 for all formations and/or pools developed on 320-acre spacing which includes but is not necessarily limited to the Quail Ridge Morrow Gas Pool; the Undesignated East Gem Morrow Gas Pool and the Undesignated Teas Pennsylvanian Gas Pool; the SE/4 for all formation and/or pools developed on 160-acre spacing within this vertical extent; and the SE/4 SE/4 for all formation and/or pools

developed on 40-acre spacing which includes but is not necessarily limited to the Undesignated Teas Bone Spring Pool, the Undesignated Teas Delaware Pool and the Undesignated Teas-Yates-Seven Rivers Pool. Said unit is to be dedicated to its Marshall 12 Fed Com Well No. 1 to be drilled as a deviated well from an unorthodox surface location 550 feet from the East line and 660 feet from the South line (Unit P) to a bottomhole location 660 feet from the East line and 660 feet from the South line (Unit P) of said Section 12 to an approximate depth 13,700 feet. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of Samson Resources Company as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 7 miles northeast of Halfway, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Duke Roush (Landman)	Approx. 30 Minutes	Approx. 8

PROCEDURAL MATTERS

Samson Resources Company has none at this time.


Ocean Munds-Dry
Attorney for Samson Resources Company