

**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)

[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

2007 APR 24 PM 2:29

April 24, 2007

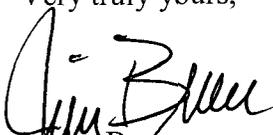
Florene Davidson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

*Case 13924*

Dear Florene:

Enclosed for filing, on behalf of Edge Petroleum Exploration 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 persons being pooled are identified on Exhibit A. Please set this matter for the May 24, 2007 Examiner hearing. Thank you.

Very truly yours,

  
James Bruce

Attorney for Edge Petroleum Exploration Company

**Working Interest Owners:**

**Chisos, Ltd.**

Attn: Ms. Sue Ann Craddock  
670 Doña Ana Road, SW  
Deming, New Mexico 88030

**Pure Energy Group, Inc.**

Attn: Mr. Larry Risley  
153 Treeline Park, Suite 220  
San Antonio, Tx 78209

**Yates Petroleum Corporation**

Attn: Mr. Chuck Moran  
105 S Fourth St  
Artesia, NM 88210

**Yates Drilling Company**

Attn: Mr. Chuck Moran  
105 S Fourth St  
Artesia, NM 88210

**Abo Petroleum Corporation**

Attn: Mr. Chuck Moran  
105 S Fourth St  
Artesia, NM 88210

**Myco Industries, Inc.**

Attn: Mr. Chuck Moran  
105 S Fourth St  
Artesia, NM 88210

**Chesapeake Exploration Limited Partnership**

Attn: Ms. Lynda Townsend  
P. O. 18496  
Oklahoma City, OK 73154-0496

EXHIBIT A

**Unleased Mineral Owners:**

**Mr. Anderson Carter, Trustor**

**Trustee of the Amended and Restated Trust Agreement dated June 7, 1999**

P.O. Box 7190  
Ruidoso, NM 88355  
(505) 258-1878

**Trustees of the Coates Energy Trust**

Ms. Sherrie Green  
Land Manager  
P.O. Box 90569  
San Antonio, TX 78209  
(210) 820-0113

**Trustee of the Jenny Roberts Schimpff Trust**

Ms. Sherrie Green  
Land Manager  
P.O. Box 90569  
San Antonio, TX 78209  
(210) 820-0113

**Trustee of the Catherine G. Roberts Trust**

Ms. Sherrie Green  
Land Manager  
P.O. Box 90569  
San Antonio, TX 78209  
(210) 820-0113

**Trustee of the Barry Coates Roberts Trust**

Ms. Sherrie Green  
Land Manager  
P.O. Box 90569  
San Antonio, TX 78209  
(210) 820-0113

**Trustee of the Lisa Stieren Hardeman Trust**

Ms. Sherrie Green  
Land Manager  
P.O. Box 90569  
San Antonio, TX 78209  
(210) 820-0113

**Trustee of the George L. Stieren Trust**

Ms. Sherrie Green  
Land Manager  
P.O. Box 90569  
San Antonio, TX 78209  
(210) 820-0113

**Trustee of the Wendy Stieren Wirth Trust**

Ms. Sherrie Green  
Land Manager  
P.O. Box 90569  
San Antonio, TX 78209  
(210) 820-0113

**Trustee of the Kelly Stieren Daniell Trust**

Ms. Sherrie Green  
Land Manager  
P.O. Box 90569  
San Antonio, TX 78209  
(210) 820-0113

**Trustee of the Amy E. Stieren Trust**

Ms. Sherrie Green  
Land Manager  
P.O. Box 90569  
San Antonio, TX 78209  
(210) 820-0113

**Bank of America, Trustee f/b/o Maggie Grisso, Pauline E. Martin, Wayne A. Grisso,  
and D.H. Grisso Melissa A. Rickman Oil and Gas Management**

Utica Plaza Suite 150  
2100 South Utica Avenue  
Tulsa, Oklahoma 74114-1436  
(918) 591-8015

**Randy Geiselman**

2700 Racquet Club Dr.  
Midland, TX 79705  
(432) 682-7900

**Dorchester Minerals**

Attn: Mr. Brad Ehrman  
3838 Oak Lawn Avenue, Suite 300  
Dallas, TX 75219-4541  
(214) 559-0300

Page 12 of 13  
S. Lovington "25" Well No. 1  
Lea County, NM

**Maecenas Minerals, LLP**

Attn: Mrs. Linda Buckner  
P.O. Box 176  
Abilene, TX 79604  
(325) 673-6429

**Mr. Larry B. Hall  
c/o Hinkle Law Firm**

Mr. Bud Martin  
P.O. Box 3580  
Midland, TX 79702  
(432) 683-4691

**Myrtle Lee Malone**

Executor of estate: Mr. Clarence L. Rosh  
1630 Warren St.  
San Fernando, CA 91340

**Blackstone Minerals, LP**

Attn: Mr. George Miller  
1001 Fannin, Suite 2020  
Houston, TX 77002-6709  
(713) 445-3200

**John W. Pilant & Jean H. Pilant, Trustees of Pilant Family Trust**

1533 Sandra Drive  
Boulder City, NV 89005

**Mercantile Trading Corporation**

2200 Ross Ave., Suite 4900 W  
Dallas, TX 75201

**The Long Trusts**

Attn: Mr. Larry Long  
P.O. Box 1700  
Kilgore, TX 75663  
(903) 988-3448

**Tom R. Cone**

P.O. Box 778  
Jay, OK 74346

**Cathy Auvenshine aka Cathy McCown**

P.O. Box 507  
Dripping Springs, TX 78620

Page 13 of 13  
S. Lovington "25" Well No. 1  
Lea County, NM

**Kenneth G. Cone**  
P.O. Box 11310  
Midland, TX 79702  
(432) 687-4583

**Annis Roberts, Successor Trustee**  
**Vicki Jeanne Saari Special Needs Trust**  
1230 South 500 West, Apt. 9B  
Bountiful, UT 84010

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF EDGE PETROLEUM  
EXPLORATION COMPANY FOR COMPULSORY  
POOLING, LEA COUNTY, NEW MEXICO.

2007 APR 24 PM 2:29

Case No. 13924

APPLICATION

Edge Petroleum Exploration Company applies for an order pooling all mineral interests from the surface to the base Devonian formation underlying the SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 25, Township 16 South, Range 36 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

1. Applicant is a working interest owner in the SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 25, and has the right to drill a well thereon.
2. Applicant proposes to drill its South Lovington "25" Well No. 1, at an orthodox location in the SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 25, to a depth sufficient to test the Devonian formation, and seeks to dedicate the SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 25 to the well to form a standard 40 acre oil spacing and proration unit for any formations and/or pools developed on 40 acre spacing within that vertical extent.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 25 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 SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 25, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral interests underlying the SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 25 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 SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 25, from the surface to the base of the Devonian formation;
- B. Designating Edge Petroleum Operating Company, Inc. 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 Edge Petroleum Exploration  
Company

PROPOSED ADVERTISEMENT

Case No. 13924: **Application of Edge Petroleum Exploration Company for compulsory pooling, Lea County, New Mexico.** Applicant seeks an order pooling all mineral interests from the surface to the base of the Devonian formation underlying the SW/4NW/4 of Section 25, Township 16 South, Range 36 East, NMPM, to form a 40-acre oil spacing and proration unit for all formations and/or pools developed on 40 acre spacing within that vertical extent. 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 Edge Petroleum Operating Company, Inc. as operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The unit is located approximately 4 miles southwest of Lovington, New Mexico.

2007 APR 24 PM 2:29