

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

2007 JUN 21 AM 9 34

IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION
FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF SAMSON RESOURCES
COMPANY FOR COMPULSORY POOLING AND
APPROVAL OF AN UNORTHODOX GAS WELL
LOCATION, LEA COUNTY, NEW MEXICO.

Case No. 13281

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Samson Resources Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Samson Resources Company
Suite 1170
200 North Lorraine
Midland, Texas 79701

Attention: Peggy Kerr
(432) 683-7063

APPLICANT'S ATTORNEY

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

OPPONENT

Pure Resources, L.P.

OPPONENT'S ATTORNEY

Michael Feldewert

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the S½ of Section 14, Township 20 South, Range 33 East, NMPM to form a standard 320-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within that vertical extent, including but not limited to the Undesignated Teas-Pennsylvanian Gas Pool and Undesignated Quail Ridge-Morrow Gas Pool. The unit will be dedicated to applicant's Maverick "14" Fed. Well No. 1, to be drilled at a location approximately 1980 feet from the south line and 1830 feet from the west line (in Unit K) of Section 14. Applicant also requests unorthodox location approval for the well in the Teas-Pennsylvanian Gas Pool and Quail Ridge-Morrow Gas Pool. 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.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|------------------------------|------------------|--|
| Elizabeth Moses (landman) | 10 min. | 1. Land plat 2. Correspondence 3. AFE 4. Notice affidavit |

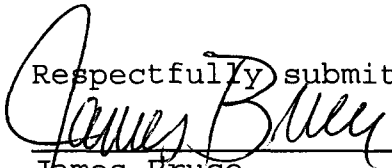
OPPONENT

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
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PROCEDURAL MATTERS

-None-

Respectfully submitted,


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

Attorney for Samson Resources
Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record by U.S. Mail this 20th day of June, 2004:

Michael Feldewert
Holland & Hart LLP
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Santa Fe, New Mexico 87504


James Bruce