

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

Case No. 13352

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

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interests from the base of the surface to the base of the Morrow formation underlying the following acreage in Section 15, Township 21 South, Range 32 East, NMPM: The E $\frac{1}{4}$ 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; the NE $\frac{1}{4}$ to form a standard 160-acre gas spacing and proration unit for any and all formations and/or pools developed on 160-acre spacing within that vertical extent; and the NE $\frac{1}{4}$ NE $\frac{1}{4}$ to form a standard 40-acre oil spacing and proration unit for any and all formations and/or pools developed on 40-acre spacing within that vertical extent. The unit will be dedicated to applicant's Mesa Verde "15" Fed. Well No. 1, to be drilled and completed at an orthodox location in the NE $\frac{1}{4}$ NE $\frac{1}{4}$ (Unit A) of Section 15. Also to be considered will be the cost of re-entering 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

WITNESSES

Elizabeth Moses
(landman)

EST. TIME

15 min.

EXHIBITS

1. Land plat
2. Ownership listing
3. Correspondence
4. AFE
5. Notice affidavit

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

-None-

Respectfully submitted,



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

Attorney for Samson Resources
Company