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, EDDY COUNTY, NEW MEXICO.

Case No. 13.49

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Samson Resources Company **Suite 1170**

200 North Loraine Midland, Texas 79701

Attention:

Rita Buress (432) 683-6313

OPPONENT

APPLICANT'S ATTORNEY

James Bruce P.O. Box 1056

Santa Fe. New Mexico 87504

(505) 982-2043

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interests from the base of the Bone Spring formation to the base of the Morrow formation underlying the E/2 of Section 17, Township 18 South, Range 30 East, NMPM, to form a standard 320-acre gas spacing and proration unit for any and all formations or pools developed on 320-acre spacing within that vertical extent, including the Undesignated Sand Tank-Strawn Gas Pool and Undesignated Sand Tank-Morrow Gas Pool. The unit is to be simultaneously designated to the proposed Sand Tank "17" Fed. Com. Well No. 2, to be located at an orthodox well location in the NE/4SE/4 of Section 17, and to the existing Sand Tank "17" Fed. Com. Well No. 1, located at an approved unorthodox

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location in the SE/4NE/4 of Section 17.. 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

WITNESSES EST. TIME EXHIBITS

Elizabeth Moses 15 min. Approx. 5

(landman)

OPPONENT

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBITS</u>

PROCEDURAL MATTERS

-None-

James Bruce

Post Office Box 1056

Respectfully submitted,

Santa Fe, New Mexico 87504

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Attorney for Samson Resources Company