

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

Case No. 13,484

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Edge Petroleum Exploration Company
Suite 2000
1301 Travis
Houston, Texas 77002

Attention: Jeff A. Sikora
(713) 427-8843

APPLICANT'S ATTORNEY

James Bruce
P.O. 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 underlying the following described acreage in Section 28, Township 19 South, Range 32 East, NMPM, and in the following manner: The S/2 to form a 320-acre gas spacing and proration unit for any formations and/or pools developed on 320-acre spacing within that vertical extent, including the Undesignated Southeast Lusk-Atoka Gas Pool and the Lusk-Morrow Gas Pool; and the SW/4 to form a 160-acre oil spacing and proration unit for any formations and/or pools developed on 160-acre spacing within that vertical extent, including the Lusk-Strawn Pool. The units are to be dedicated to the South Lusk 28 "H" Fed. Com. Well No. 1, to be drilled at an orthodox location in the SW/4SW/4 of Section

et 3/15/05

28. 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 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

Jeff A. Sikora
(landman)

20 min.

Approx. 6

OPPONENT

WITNESSES

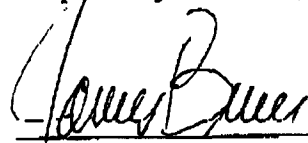
EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Applicant requests that this case be consolidated for hearing with Case No. 13506.

Respectfully submitted,



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

Attorney for Edge Petroleum Exploration
Company

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

IN THE MATTER OF THE APPLICATION
OF EDGE PETROLEUM COMPANY FOR
COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO

CASE NO. 13484

ENTRY OF APPEARANCE

Comes now CIMAREX ENERGY COMPANY, by and through its undersigned attorneys, Miller Stratvert P.A., (J. Scott Hall) and hereby enters its appearance in the above cause.

MILLER STRATVERT P.A.

By:

J. Scott Hall
J. Scott Hall
Attorneys for Cimarex Energy Company
Post Office Box 1986
Santa Fe, New Mexico 87504-1986
(505) 989-9614

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of record on the 13th day of July, 2005, as follows:

Gail MacQuesten, Esq.
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87504
(505) 476-3462/Facsimile

James Bruce, Esq.
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2151/Facsimile

J. Scott Hall
J. Scott Hall

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7/13/05