s-|``

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. 13,596

)K ..1-8165

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

APPLICANT'S ATTORNEY

James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attention: Rita Buress (432) 683-6313

OPPONENT

STATEMENT OF THE CASE

APPLICANT

Samson Resources Company seeks an order pooling all mineral interests from 4000 to 13,693 feet subsurface underlying the following described acreage in Section 15, Township 20 South, Range 33 East, NMPM, Lea County, New Mexico, and in the following manner: The S/2 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 Teas-Pennsylvanian Gas Pool; and the SE/4 to form a standard 160-acre gas spacing and proration unit for any and all formations or pools developed on 160-acre gas spacing within that vertical extent. The units are to be designated to the Bandit "15" Federal Well No. 2, to be located at an orthodox well location in the NW/4SE/4 of Section 15. 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

(landman)

Elizabeth Moses

EST. TIME

EXHIBITS

20 min.

Approx. 6

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