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 GMT EXPLORATION COMPANY LLC TO RE-OPEN CASE NO. 15394 FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 15,394

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

GMT Exploration Company LLC

Suite 2000

1560 Broadway

Denver, Colorado 80202

James Bruce

P.O. Box 1056

Santa Fe, New Mexico 87504

APPLICANT'S ATTORNEY

(505) 982-2043

Attention:

Philip G. Wood

(432) 682-3715

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

GMT Exploration Company LLC seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the W/2W/2 of Section 22, Township 24 South, Range 34 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard unit (project area) for all pools developed on 40 acre spacing within that vertical extent. The unit will be dedicated to the Romeo Fed. Com. Well No. 1H, a horizontal well with a surface location in the NW/NW/4, and a terminus in the SW/4SW/4, of Section 22. 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** Phil Wood 10 min. Approx. 6 (landman) Mike Dilli

(geologist)

10 min.

Approx. 4

OPPONENT

WITNESSES EST. TIME **EXHIBITS**

PROCEDURAL MATTERS

Respectfully submitted,

James Bruce

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Attorney for GMT Exploration Company LLC