

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

**APPLICATION OF SAMSON RESOURCES COMPANY,
KAISER-FRANCES OIL COMPANY AND MEWBOURNE
OIL COMPANY** **CASE NO. 13492**

**APPLICATION OF CHESAPEAKE
PERMIAN, L.P. FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

CASE NO. 13493

**CHESAPEAKE'S MOTION TO VACATE AND RESCHEDULE
COMMISSION HEARING**

2006 SEP 28 AM 8

Chesapeake Operating, Inc. ("Chesapeake") hereby moves the New Mexico Oil Conservation Commission to vacate the hearing of these matter currently set commence at 1: 00 pm on Tuesday, October 3, 2006 and to reschedule these matter to a new date, and as grounds therefore, states that it has been surprised by Samson's et al untimely filing on September 26, 2006 of some 30 additional exhibits (identified as some 15 replacement exhibits and another 15 new exhibits) that Samson's intends to use at the October 3, 2006 hearing. See **Exhibit A attached.**

These cases were being heard by the Commission on August 10, 2006 when it was determined that the Commission would have insufficient time to hearing all the testimony within the scheduled time period. By agreement, these cases were continued to October 3, 2006 to commence at 1:00 with October 4th also being reserved for hearing these cases.

Samson waited 46 days and then one week before the hearing, and without prior discussions with counsel for Chesapeake, filed these additional exhibits.

In an effort to avoid this request, counsel for Chesapeake, after receiving these additional exhibits at 3:30 pm on September 26, 2006, Federal Expressed them to Chesapeake in Oklahoma City. Counsel for Chesapeake has been advised that both Mr. David Godsey and Mr. Rodney Johnson, its two primary witnesses in these cases, are unavailable to review these "surprise exhibits" and will not be able to do so until this weekend thus leaving insufficient time to review and be prepare to respond.

Chesapeake have been unduly surprised by these new Samson's exhibits. This should be a hearing upon the merits based upon each parties best efforts to present good technical cases. It should not be a hearing by ambush.

Accordingly, Chesapeake moves at the Commission vacate this hearing and rescheduled these cases and in doing so enter a scheduling order to establishing

deadline for submittal of exhibits and witnesses and setting forth a schedule for to
presentations of witnesses, exhibits including direct and cross-examinations.

Respectfully submitted,



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(505) 982-4285

Earl E. DeBrine, Jr., Esq.
Modrall Sperling Roehl Harris & Sisk, P.A.

**Attorneys for Chesapeake Operating, Inc.
and
Chesapeake Permian, L.P.**

CERTIFICATE OF SERVICE

I, W. Thomas Kellahin, certify that a true and correct copy of this pleading
send via facsimile on September 28, 2006 as follows:

J.E. Gallegos, Esq.
Gallegos Law Firm PC
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Carol Leach, Esq.
NM Energy, Mineral & Natural Resources Department
1220 South St. Francis Drive
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A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', is written over a horizontal line. The signature is stylized and cursive.

W. Thomas Kellahin

GALLEGOS LAW FIRM

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September 26, 2006
(Our File No. 05-376.00)

J.E. GALLEGOS:

VIA HAND-DELIVERY

Florene Davidson, Administrator
New Mexico Oil Conservation Commission
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87504

Re: Application of Samson Resources Company, Kaiser-Francis Oil Company and Mewbourne Oil Company for Cancellation of Two Permits and Approval of a Drilling Permit, Lea County, New Mexico, Case No. 13492
Application of Chesapeake Permian, L.P. for Compulsory Pooling, Lea County, New Mexico, Case No. 13493

Dear Ms. Davidson:

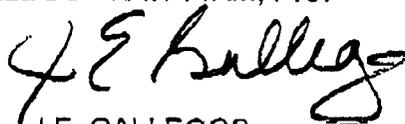
Please find enclosed for the Commission five copies of Samson et al. exhibits. These exhibits are accompanied by an exhibit list that specifies certain previously furnished exhibits that are replaced and will not be offered, and identifies the replacement exhibits and new exhibits.

Thank you for your usual cooperation in handling these matters.

Sincerely,

GALLEGOS LAW FIRM, P.C.

By


J.E. GALLEGOS

JEG:cc

Enclosures

Cc: Earl Debrine w/enclosures
Tom Kellahin w/enclosures
Mark Lauer
Mickey Olmstead
Scott Hall



**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:**

CASE NO. 13492

**APPLICATION OF SAMSON RESOURCES
COMPANY, KAISER-FRANCIS OIL COMPANY,
AND MEWBOURNE OIL COMPANY FOR
CANCELLATION OF TWO PERMITS AND
APPROVAL OF A DRILLING PERMIT, LEA
COUNTY, NEW MEXICO.**

CASE NO. 13493

**APPLICATION OF CHESAPEAKE PERMIAN, L.P.
FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.**

**SAMSON RESOURCES COMPANY, KAISER-FRANCIS OIL COMPANY,
AND MEWBOURNE OIL COMPANY
EXHIBIT LIST - DE NOVO HEARING OCTOBER 3, 2006**

EX NO.	NOTES	DESCRIPTION	OFFER/ADMIT
Joint 1		STIPULATION BY THE PARTIES AS TO UNDISPUTED EVIDENCE TO BE CONSIDERED BY THE COMMISSION	Admitted 8.10.06
1		O&G FIELDS, RGS 1967	
2		STRATIGRAPHIC COLUMN	
3		TYPE LOG	
4		SYMPOSIUM 99 SUPPLEMENT	
5		PERMIAN BASIN: BACK TO BASICS	
6		FUTURE PETROLEUM PROVINCES OF NM	
7		PERMIAN BASIN: PROVIDING ENERGY...	
8		2004 PRODUCING ZONE MAP	
9		PLAY ANALYSIS ...	
10		HABITAT OF OIL	
11		ORDER OF THE DIVISION	
12		GEOLOGY OF THE DELAWARE BASIN	
13		CHESAPEAKE - REGIONAL X-SEC	
13A	New	WEST-EAST CROSS-SECTION ACROSS CBP	
14		CHESAPEAKE EXHIBIT 29	

EX NO.	NOTES	DESCRIPTION	OFFER/ADMIT
15		TOBOSA BASIN DIAGRAMS	
15A	New	PETROLEUM GEOLOGY OF THE PERMIAN BASIN	
16		PERMIAN BASIN; PROVING GROUND...	
17		O&G FIELDS, RGS 1995	
18		ATLAS OF MAJOR ROCKY MNTN...	
19		ARIAL PHOTO RIO GRANDE	
20		GEOMAP DEEP	
21		GEOMAP MEDIUM	
22	Withdrawn	MAP-STRUCTURE TOP MORROW CLASTICS (CREATED 5/2006)	
22A	Replacement	MAP-STRUCTURE TOP MORROW CLASTICS (CREATED 9/2006)	
23		SEISMIC SECTION	
24	Withdrawn	MAP-ISOPACH MORROW B NET SD (CREATED 5/2006)	
24A	Replacement	MAP-ISOPACH MORROW B NET SD (CREATED 9/2006)	
25	Withdrawn	MAP-STRUCTURE/ISOPACH COMBO (CREATED 5/2006)	
25A	Replacement	MAP-STRUCTURE/ISOPACH COMBO (CREATED 9/2006)	
26	Withdrawn	MAP-CUMULATIVE PRODUCTION (CREATED 5/2006)	
26A	Replacement	MAP-CUMULATIVE PRODUCTION (CREATED 8/2006)	
27	Withdrawn	MAP-CUMULATIVE PRODUCTION WITH CUM/EUR DOTS (CREATED 5/2006)	
27A	Replacement	MAP-CUMULATIVE PROD WITH CUM/EUR DOTS (CREATED 8/2006)	
28	Withdrawn	MAP-ISOPACH MORROW B NET SD WITH CUM/EUR DOTS (CREATED 5/2006)	
28A	Replacement	MAP-ISOPACH WITH CUM/EUR DOTS (CREATED 9/2006)	
29	Withdrawn	X-SEC W-E #3 (CREATED 5/2006)	
29A	Replacement	X-SEC W-E #3 (UPDATED 8/2006)	
30	Withdrawn	X-SEC W-E #2 (CREATED 5/2006)	
30A	Replacement	X-SEC W-E #2 (UPDATED 8/2006)	
31	Withdrawn	X-SEC W-E #1 (CREATED 5/2006)	
31A	Replacement	X-SEC W-E #1 (UPDATED 8/2006)	
32	Withdrawn	X-SEC SW-NE (CREATED 5/2006)	
32A	Replacement	X-SEC SW-NE (UPDATED 8/2006)	
33	Withdrawn	X-SEC NW-SE (CREATED 5/2006)	
33A	Replacement	X-SEC NW-SE (UPDATED 8/2006)	
34	Withdrawn	X-SEC N-S (CREATED 5/2006)	
34A	Replacement	X-SEC N-S #1 (CREATED 8/2006)	
34B	New	X-SEC N-S #2 (CREATED 8/2006)	
34C	New	KAISER-FRANCIS HUNGER BUSTER #3 LOG SECTION	
35	Withdrawn	E60 VISION STILL SHOTS	
36	Withdrawn	CHESAPEAKE EXHIBIT 33	
36A	Replacement	CHESAPEAKE EXHIBIT 33	
37		DEPOSITIONAL SUMMERY DIAGRAM	
38		FLUVIAL FACIES DIAGRAM	
39		AD JAMES CORE DESCRIPTION	
40		CORE LAB STUDY-SEQUENCE STRATIGRAPHY...	
41		FLUVIAL FACIES - CORES	
42		WESTERN OIL STATE J LOG SECTION	
43		CHESAPEAKE'S ISOPACH NET M MRW	
43A	New	CHESAPEAKE'S ISOPACH UPPER MORROW RECONTOURED	
43B	New	CHESAPEAKE'S ISOPACH UPPER NEW MORROW	

EX NO.	NOTES	DESCRIPTION	OFFER/ADMIT
		RECONTOURED	
43C	New	CHESAPEAKE'S ISOPACH LOWER MORROW RECONTOURED	
44		CHESAPEAKE'S EXHIBIT 39	
45	Withdrawn	REASONABLE RESERVOIR PRESSURE DATA POINTS	
45A	Replacement	REASONABLE RESERVOIR PRESSURE DATA POINTS TABLE	
46	Withdrawn	GRAPH-RESERVOIR PRESSURE DATA POINTS	
46A	Replacement	GRAPH-RESERVOIR PRESSURE DATA POINTS	
46B	New	GRAPH-WEL P/Z V CUM (POINTS NOT CONNECTED)	
46C	New	GRAPH-WEL P/Z V CUM (POINTS CONNECTED)	
46D	New	GRAPH-WEK P/Z V CUM (POINTS NOT CONNECTED)	
46E	New	GRAPH-WEK P/Z V CUM (POINTS CONNECTED)	
46F	New	GRAPH-RESERVOIR PRESSURE DATA POINTS AFTER PZ	
47		MAP- PRESSURE DATA	
48		CROSS-SECTION A-A'	
49		PRESSURE BUILDUP OSUDO STATE #1	
50		PRESSURE BUILDUP OSUDO #2	
50A	New	VOLUMETRIC CALCULATION	
50B	New	VOLUMETRIC UNCERTAINTY	
50C	New	APPLIED PETROLEUM RESERVOIR ENGINEERING	
51		DUPLICATION OF EXHIBIT 38	
52		DUPLICATION OF EXHIBIT 40	
53		CONCLUSIONS	
54		MAP-NET POROSITY ISOPACH-CHENEY, CHARUK MAY 2004	
55		CHENEY - OSUDO SOUTH FIELD STUDY 4/2004	
56		CHENEY - NORTH-SOUTH CROSS-SECTION 4/2004	
57		STRUCTURE MAP TOP M MRRW-CHENEY, CHARUK MAY 2004	