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:

1 149/1

APPLICATION OF GECKO, INC. FOR AN UNORTHODOX OIL WELL LOCATION, LEA COUNTY, NEW MEXICO. CASE NO. 11008

APPLICATION OF GECKO, INC. FOR AN UNORTHODOX OIL WELL LOCATION, LEA COUNTY, NEW MEXICO CASE NO. 11009

CONSOLIDATED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by GECKO, INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

GECKO, Inc.
310 West Wall Street
Midland, Texas 79701
Attn: Mr. Steve L. Thomson
(915) 686-0121

W. Thomas Kellahin KELLAHIN AND KELLAHIN P.O. Box 2265 Santa Fe, NM 87504 (505) 982-4285 Pre-Hearing Statement Case Nos. 11008 & 11009 Page 2

OPPOSITION OR OTHER PARTY

ATTORNEY

None

STATEMENT OF CASE

APPLICANT

Gecko Inc. is the applicant in NMOCD Case 11008 and is the proposed operator for and a working interest owner in the Gecko State "36" Well No. 1 to be drilled at an unorthodox oil well location 2414 FNL and 1109 feet FWL (Unit E) of Section 36, T16S, R37E, NMPM, Shipp-Strawn Pool, Lea County, New Mexico. The Strawn formation at this location is within the Shipp-Strawn Pool which provides, among other things, for 80-acre proration and spacing units for oil production with wells located within 150 feet of the center of a governmental quarter-quarter section.

Gecko Inc. also is the applicant in NMOCD Case 11009 and is the proposed operator for and a working interest owner in the Gecko State "26" Well No. 1 to be drilled at an unorthodox oil well location 555 FSL and 1648 feet FWL (Unit N) of Section 26, T16S, R37E, NMPM, Casey-Strawn Pool, Lea County, New Mexico. The Strawn formation at this location is within the Casey-Strawn Pool which provides, among other things, for 80-acre proration and spacing units for oil production with wells located within 150 feet of the center of a governmental quarter-quarter section.

Each well is based upon geological considerations and in order to maximize the opportunity to encounter the Strawn formation at its most favorable location in each of these spacing units, Gecko Inc. proposes to locate each well in the Strawn formation at an unorthodox location. Pre-Hearing Statement Case Nos. 11008 & 11009 Page 3

The direction of encroachment for each well is towards spacing units which involve the same owners with the same percentages as those who will participate in the subject wells.

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS

Steve L. Thomson

(petroleum engineer) 25 min. Est. 4-5

PROCEDURAL MATTERS

None applicable at this time.

KELLAHIN AND KELLAHIN

W. Thomas Kellahin

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By:

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