Jason Kellahin W. Thomas Kellahin

Karen Aubrey James B. Grant KELLAHIN and KELLAHIN Attorneys at Law El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265

October 30, 1984

Telephone 982-4285 Area Code 505

RECEIVED

OCT 3 J 1984

OIL CONSERVATION DIVISION

Mr. Richard Stamets Oil Conservation Division Post Office Box 2088

Santa Fe, New Mexico 87501

Case 8421

1

Re: In the Matter of the Application of Samson Resources Company, for Compulsory Pooling, Lea County, New Mexico

Dear Mr. Stamets:

HAND-DELIVERED

Enclosed please find an application for Compulsory Pooling filed on behalf of Samson Resources Company. Please set this matter for hearing on November 28, 1984.

Very truly yours Karen Aubrey

KA:mh

Enc.

cc: Mr. Steve Area Samson Resources Company Samson Plaza Two West Second Street Tulsa, Oklahoma 74103

STATE OF NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS OIL CONSERVATION DIVISION

RECEIVED

OCT 3 0 1984

OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF SAMSON RESOURCES COMPANY, FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. <u>842</u>

APPLICATION

COMES NOW, SAMSON RESOURCES COMPANY, and applies to the Oil Conservation Division of the State of New Mexico, for an Order pooling all mineral interests from the surface to 9,750 feet underlying the NW/4 of Section 8, Township 9 South, Range 34 East, NMPM, Lea County, New Mexico, for the formation of a proration and spacing unit and an Order approving an unorthodox gas well location, and in support thereof would show the Commission:

 Applicant is the owner of the right to drill and develop the NW/4 of Section 8, Township 9 South, Range 34 East, NMPM.

2. Applicant proposes to drill a well at an unorthodox location 525 feet from the West line and 600 feet from the North line, and proposes to dedicate the NW/4 of Section 8 to said well. 3. Applicant has selected the unorthodox location because of the location of a pipeline on the surface.

4. Applicant has sought to obtain the cooperation of all parties.

5. In order to obtain their just and equitable share of the production underlying the above lands, Applicant needs an Order pooling the mineral interest involved.

5. Those who have not consented to join in the drilling of the well, with their addresses, to the best of Applicant's information and belief, are as follows:

- Sun Exploration and Production Company Post Office Box 2880 Dallas, Texas 75221
- Heritage Resources Post Office Box 777 Davis, Oklahoma 73030
- Petroleum Corporation of Texas Post Office Box 911 Breckenridge, Texas 76024
- Southern Minerals Corporation (address unknown)
- 5. Delaware Apache Corporation c/o Apache Corp. 1700 Lincoln, Suite 4900 Denver, Colorado 80203-4549

The foregoing interests total 81.33%
working interest.

7. The parties named in paragraph 5 above have been furnished a copy of this application.

8. The drilling of a well at the unorthodox location requested above will permit applicant to recover hydrocarbons which otherwise would not be recovered.

WHEREFORE, Applicant prays that this application for hearing before the Division's duly be set appointed examiner, and that after notice and hearing as required by law, the Division enter its Order pooling the mineral interest described herein, and approving an unorthodox location as set forth above. Applicant further prays that it be named operator of the well, and that the Order make provision for Applicant to recover out of production its costs of drilling the subject well, completing and equipping it, costs of operation, including costs of supervision and a risk factor in the amount of 200% for the drilling of the well, for such other and further relief as may be proper.

- 3 -

Respectfully submitted,

Samson Resources Company

By:

Karen Aubrey KELLAHIN & KELLAHIN Post Office Box 2265 Santa Fe, New Mexico 87501

Attorneys for Applicant

cc: Mr. Steve Area Samson Resources Company Samson Plaza Two West Second Street Tulsa, Oklahoma 74103

> Sun Exploration and Production Company Post Office Box 2880 Dallas, Texas 75221

Heritage Resources Post Office Box 777 Davis, Oklahoma 73030

Petroleum Corporation of Texas Post Office Box 911 Breckenridge, Texas 76024

Southern Minerals Corporation (address unknown)

Delaware Apache Corporation c/o Apache Corp. 1700 Lincoln, Suite 4900 Denver, Colorado 80203-4549 Jason Kellahin W. Thomas Kellahin

Karen Aubrey James B. Grant KELLAHIN AND KELLAHIN *Attorneys at Law* El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265

November 26, 1984

Telephone 982-4285 Area Code 505

ALL TEL

101V (J. 1814

CIL CONSERVATION DIVISION

Jimmy Powers, Esq. Sun Exploration and Production Company Four North Park East Dallas, Texas 75221

Re; In the Matter of the Amended Applilcation of Samson Resources Company, for Compulsory Pooling and Unorthodox Location, Lea County, New Mexico

Dear Jimmy:

After staking the proposed location referred to in the above application, Samson Resources has discovered that it is necessary to change the Unorthodox location to 330 feet from the North line and 520 feet from the West line. The amended application will be heard on December 19, 1984. As we have previously discussed, if you and Samson are not able to come to an agreement in connection with this matter, we will refer Samson Resources to other counsel for presentation of the case.

£ruly your∉ Verv Karen Aubrey

KA:mh

Enc.

cc: Mr. Steve Area Samson Resources Company Samson Plaza Two West Second Street Tulsa, Oklahoma 74103 Jason Kellahin W. Thomas Kellahin

Karen Aubrey James B. Grant KELLAHIN AND KELLAHIN Attorneys at Law El Patio - 117 North Guadalupe Post Office Box 2265 Santa Fe, New Mexico 87504-2265

Telephone 982-4285 Area Code 505

November 26, 1984

HAND-DELIVERED

LECEIVED,

MOV : 1964

Mr. Richard Stamets Oil Conservation Division Post Office Box 2088 Santa Fe, New Mexico 87501

CIL CONSERVATION DIVISION

Re: In the Matter of the Amended Application of Samson Resources Company, for Compulsory Pooling and Unorthodox Location, Lea County, New Mexico

Dear Mr. Stamets:

Enclosed please find an amended application for Compulsory Pooling and Unorthodox Location, filed on behalf of Samson Resources Company. Please set this matter for hearing on December 19, 1984.

Very/truly yours,

Karen Aubrey

KAlen Aubrey KA:mh Enc. cc: Mr. Steve Area Samson Resources Company Samson Plaza Two West Second Street Tulsa, Oklahoma 74103

> Sun Exploration and Production Company Post Office Box 2880

Dallas, Texas 75221 Heritage Resources

Post Office Box 777 Davis, Oklahoma 73030

Petroleum Corporation of Texas Post Office Box 911 Breckenridge, Texas 76024

Delaware Apache Corporation c/o Apache Corp. 1700 Lincoln, Suite 4900 Denver, Colorado 80203-4549

Southern Minerals Corporation (address unknown)

RECEIVED

MIN 1. 1984

STATE OF NEW MEXICO OIL CONCERVATION DIVISION DEPARTMENT OF ENERGY AND MINERALS OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF SAMSON RESOURCES COMPANY, FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO.

A P P L I C A T I O N

COMES NOW, SAMSON RESOURCES COMPANY, and applies to the Oil Conservation Division of the State of New Mexico, for an Order pooling all mineral interests from the surface to 9,750 feet underlying the NW/4 of Section 8, Township 9 South, Range 34 East, NMPM, Lea County, New Mexico, for the formation of a proration and spacing unit and an Order approving an unorthodox gas well location, and in support thereof would show:

 Applicant is the owner of the right to drill and develop the NW/4 of Section 8, Township 9 South, Range 34 East, NMPM.

2. Applicant proposes to drill a well at an unorthodox location 525 feet from the West line and 330 feet from the North line, and proposes to dedicate the NW/4 of Section 8 to said well, in the event that said well is completed in the Penn Bough C Formation.

3. Applicant has selected the unorthodox location because of the location of a pipeline on the surface.

4. Applicant has sought to obtain the cooperation of all parties.

5. In order to obtain their just and equitable share of the production underlying the above lands, Applicant needs an Order pooling the mineral interest involved.

5. Those who have not consented to join in the drilling of the well, with their addresses, to the best of Applicant's information and belief, are as follows:

- Sun Exploration and Production Company Post Office Box 2880 Dallas, Texas 75221
- Heritage Resources Post Office Box 777 Davis, Oklahoma 73030
- Petroleum Corporation of Texas Post Office Box 911 Breckenridge, Texas 76024
- Southern Minerals Corporation (address unknown)
- 5. Delaware Apache Corporation c/o Apache Corp. 1700 Lincoln, Suite 4900 Denver, Colorado 80203-4549

The foregoing interests total 81.33% working interest.

7. The parties named in paragraph 5 above have been furnished a copy of this application.

8. The drilling of a well at the unorthodox location requested above will permit applicant to recover hydrocarbons which otherwise would not be recovered.

WHEREFORE, Applicant prays that this application set for hearing before the Division's duly be appointed examiner, and that after notice and hearing as required by law, the Division enter its Order pooling the mineral interest described herein, and approving an unorthodox location as set forth above. Applicant further prays that it be named operator of the well, and that the Order make provision for Applicant to recover out of production its costs of drilling the subject well, completing and equipping operation, including it, costs of costs of supervision and a risk factor in the amount of 200% for the drilling of the well, for such other and further relief as may be proper.

- 3 -

Respectfully submitted,

Samson Resources Company By: Karen Aubrey

KELLAHIN & KELLAHIN Post Office Box 2265 Santa Fe, New Mexico 87501

Attorneys for Applicant

cc: Mr. Steve Area Samson Resources Company Samson Plaza Two West Second Street Tulsa, Oklahoma 74103

> Sun Exploration and Production Company Post Office Box 2880 Dallas, Texas 75221

Heritage Resources Post Office Box 777 Davis, Oklahoma 73030

Petroleum Corporation of Texas Post Office Box 911 Breckenridge, Texas 76024

Southern Minerals Corporation (address unknown)

Delaware Apache Corporation c/o Apache Corp. 1700 Lincoln, Suite 4900 Denver, Colorado 80203-4549