

**OIL AND GAS DOCKET NO. 10-0269791**

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**THE APPLICATION OF SAMSON LONE STAR, LLC TO AMEND FIELD RULE NOS. 2 AND 3 FOR THE WEST PARK (GRANITE WASH) FIELD, HEMPHILL AND WHEELER COUNTIES, TEXAS**

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**HEARD BY:** Richard D. Atkins, P.E. - Technical Examiner

**HEARING DATE:** April 14, 2011

**APPEARANCES:**

**REPRESENTING:**

**APPLICANT:**

Glenn E. Johnson  
James M. Clark

Samson Lone Star, LLC

**INTERVENOR:**

Sandra Bolz Buch

Devon Energy Production Co, LP

**INTERESTED PARTY:**

Bill Spencer

Chesapeake Operating, Inc.

**EXAMINER'S REPORT AND RECOMMENDATION**

**STATEMENT OF THE CASE**

Field Rules for the West Park (Granite Wash) Field were adopted in Final Order No. 10-0258437, effective September 23, 2008. The Field Rules are summarized as follows:

1. Designation of the field as the correlative interval from 11,400 feet to 14,750 feet as shown on the log of the Samson Lone Star, LLC - Zybach Lease, Well No. 1 (API No. 42-483-31386);
2. 467'-660' well spacing with special provisions for "take points" in horizontal wells and Statewide Rule 38 exceptions for fractional proration units of less than 40 acres;
3. Special provisions for horizontal "stacked lateral" wells;
4. Allocation based on 95% deliverability/potential and 5% per well with AOF status.

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Samson Lone Star, LLC (“Samson”) requests that Field Rule Nos. 2 and 3 be amended as follows:

2. 467'-660' well spacing and 200' lease line spacing for the first and last take points with special provisions for “take points”, “off-lease” penetration point, no perf zones and a 47 foot “box” rule for horizontal wells and Statewide Rule 38 exceptions for fractional proration units of less than 40 acres;
3. For “stacked lateral” wells, eliminate the requirement that the surface locations must be within 250 feet of each other.

Prior to the hearing, the 200' lease line spacing for the first and last take points provision was protested. At the hearing, Samson withdrew the 200' lease line spacing for the first and last take points provision. Additionally, Devon Energy Production Co, LP submitted waivers from the other operators in the field in support of a 0' between well spacing rule. Samson did not consider this proposal to be adverse. The application was then unprotested and the examiner recommends that Field Rule Nos. 2 and 3 for the West Park (Granite Wash) Field be amended, as proposed by Samson.

### **DISCUSSION OF EVIDENCE**

The West Park (Granite Wash) Field was discovered in August 1994 at an average depth of 12,000 feet. The field is a non-associated gas field with 57 producing gas wells and five operators carried on the proration schedule. The allocation formula is currently suspended. Cumulative production from the field through December 2010 is 39.5 BCFG and 768.3 MBO.

Samson is proposing to drill additional horizontal wells and requests additional horizontal rules in order to promote the efficient and effective development of the remaining hydrocarbons. Samson requests a spacing rule that requires 467' lease line spacing, no between well spacing with special provisions for “take points”, “off-lease” penetration point, no perf zones and a 47 foot “box” rule for horizontal wells and Statewide Rule 38 exceptions for fractional proration units of less than 40 acres. Samson argues that the proposed spacing is necessary to allow drilling of horizontal wells which may have to be placed very near each other in some cases.

Samson proposes a tolerance “box rule” for horizontal drainhole wells that would allow drainholes to deviate 47 feet from either side of their permitted track without the necessity of obtaining a Statewide Rule 37 exception. As drilled wells for which all points are located within the “box” would be considered in compliance with their drilling permits.

Samson requests to eliminate the requirement that the surface locations must be within 250 feet of each other for “stacked lateral” wells. The rule would allow stacked horizontal laterals within the Granite Wash correlative interval that are drilled from different surface locations to be considered a single well for regulatory purposes. It is proposed that

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a stacked lateral be defined to be multiple horizontal drainholes which are drilled from different surface locations.

Samson submitted two tables which showed that 10 Granite Wash fields already had an “off-lease” penetration point rule and four Granite Wash fields already had a no between well spacing rule. Both rules are included in the Mills Ranch (Granite Wash Cons.) and Stiles Ranch (Granite Wash Cons) Fields. Samson also requests that the allocation formula remain suspended, as there is a 100% market demand for all of the gas produced from the field.

### **FINDINGS OF FACT**

1. Notice of this hearing was given to all persons entitled to notice and no protests were received.
2. The West Park (Granite Wash) Field was discovered in August 1994 at an average depth of 12,000 feet. The field is a non-associated gas field with 57 producing gas wells and five operators carried on the proration schedule.
3. Field Rules for the West Park (Granite Wash) Field provide for a designated interval, 467'-660' well spacing with special provisions for “take points” and “stacked laterals” in horizontal wells and Statewide Rule 38 exceptions for fractional proration units of less than 40 acres.
4. The West Park (Granite Wash) Field is actively being developed with horizontal drainhole wells.
5. Field Rules that provide for 467' lease line spacing and no between well spacing with special provisions for “take points”, “off-lease” penetration point, a 47 foot “box rule” and “stacked laterals” for horizontal wells will provide consistency in developing the field and will allow greater flexibility in selecting future drilling locations.
6. The proposed 47 foot “box rule” is necessary to allow operators reasonable minor deviations from the wellbore track that has been permitted.
7. The proposed “stacked lateral” rule will allow stacked horizontal laterals within the Granite Wash correlative interval that are drilled from different surface locations to be considered a single well for regulatory purposes, which will facilitate the additional recovery of gas.
8. Ten Granite Wash fields already have an “off-lease” penetration point rule and four Granite Wash fields already have a no between well spacing rule.

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Both rules are included in the Mills Ranch (Granite Wash Cons.) and Stiles Ranch (Granite Wash Cons) Fields.

9. Continued suspension of the allocation formula is appropriate, as there is a 100% market demand for all of the gas produced from the field.

### **CONCLUSIONS OF LAW**

1. Proper notice of this hearing was issued.
2. All things have been accomplished or have occurred to give the Commission jurisdiction in this matter.
3. Amending Field Rule Nos. 2 and 3 for the West Park (Granite Wash) Field is necessary to prevent waste, protect correlative rights and promote development of the field.

### **RECOMMENDATION**

Based on the above findings of fact and conclusions of law, the examiner recommends that the Commission amend Field Rule Nos. 2 and 3 for the West Park (Granite Wash) Field, as proposed by Samson Lone Star, LLC.

Respectfully submitted,

Richard D. Atkins, P.E.  
Technical Examiner