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

APPLICATION OF STRATA PRODUCTION CO. FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

Case No. 22435

APPLICATION OF STRATA PRODUCTION CO. FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

Case No. 22436

PRE-HEARING STATEMENT

STRATA PRODUCTION COMPANY provides this Pre-Hearing Statement as required

by the rules of the Division.

APPEARANCES

APPLICANT

STRATA PRODUCTION COMPANY

APPLICANT'S ATTORNEY:

Sharon T. Shaheen Ricardo S. Gonzales Montgomery & Andrews, P.A. P.O. Box 2307 Santa Fe, New Mexico 87504-2307 Telephone: (505) 986-2678 Email: <u>sshaheen@montand.com</u> rgonzales@montand.com

OTHER PARTIES

No other party has entered an appearance at this time.

STATEMENT OF THE CASE

In Case No. 22435, Applicant seeks an order from the Division pooling all uncommitted

mineral interests in the Delaware formation (Forty Niner Ridge; Delaware [24750]) in a standard

160-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the N/2 S/2

of Section 23, Township 23 South, Range 30 East in Eddy County, New Mexico. Applicant proposes to dedicate the HSU to the Roadrunner Fed Com 23 ILL 5H well, to be horizontally drilled from an approximate surface hole location 1980' FSL and 330' FEL of Section 23, T23S-R30E, to an approximate bottom hole location 2310' FSL and 100' FWL of Section 23, T23S-R30E ("Roadrunner 23 ILL 5H"). The first and last take points will meet the setback requirements set forth in the statewide rules for horizontal oil wells. The completed lateral for the Roadrunner 23 ILL 5H will comply with the standard setback.

In Case No. **22436**, Applicant seeks an order from the Division pooling all uncommitted mineral interests in the Delaware formation (Forty Niner Ridge; Delaware [24750]) in a standard 160-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the S/2 S/2 of Section 23, Township 23 South, Range 30 East in Eddy County, New Mexico. Applicant proposes to dedicate the HSU to the Roadrunner Fed Com 23 PML 6H well, to be horizontally drilled from an approximate surface hole location 860' FSL and 530' FEL of Section 23, T23S-R30E, to an approximate bottom hole location 990' FSL and 100' FWL of Section 23, T23S-R30E ("Roadrunner 23 PML 6H"). The first and last take points will meet the setback requirements set forth in the statewide rules for horizontal oil wells. The completed lateral for the Roadrunner 23 PML 6H will comply with the standard setback.

Also to be considered in each of the above-referenced cases will be the cost of drilling and completing the wells and allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The wells and lands are located approximately 14 miles East of Loving, New Mexico.

The only party sought to be pooled in this proceeding is OXY USA Inc.

Released to Imaging: 12/30/2021 9:08:44 AM

PROPOSED EVIDENCE

<u>APPLICANT</u>:

WITNESSES	EST. TIME	EXHIBITS
Mitch Krakauskas, Landman	By affidavit	5-6 for each case
Scott Kelley, Geologist	By affidavit	5-6 for each case

PROCEDURAL MATTERS

Assuming no opposition at the time of hearing, this case will be presented by affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, PA.

By: /s/Sharon T. Shaheen

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QUESTIONS

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Action 69493

QUESTIONS

Operator:	OGRID:
STRATA PRODUCTION CO	21712
P.O. Box 1030	Action Number:
Roswell, NM 882021030	69493
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony			
	Please assist us by provide the following information about your testimony.		
ſ	Number of witnesses	Not answered.	
I	Testimony time (in minutes)	Not answered.	