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. 24130

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

Case No. 24131

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 Samantha H. Catalano Montgomery & Andrews, P.A. P.O. Box 2307 Santa Fe, New Mexico 87504-2307 (505) 986-2678 <u>sshaheen@montand.com</u> <u>scatalano@montand.com</u> ec: <u>wmcginnis@montand.com</u>

OTHER PARTIES

None at this time.

STATEMENT OF THE CASE

In **Case No. 24130**, Applicant seeks an order from the Division pooling all uncommitted mineral interests in the Delaware formation (Forty Niner Ridge; Delaware [24750]) in a standard 320-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the S/2 N/2 of Sections 27 and 28, Township 23 South, Range 30 East in Eddy County, New Mexico. Applicant

proposes to dedicate the HSU to the **Eeyore 27 28 HEL Fed Com 2H** well, to be horizontally drilled from an approximate surface hole location 2240' FNL and 230' FEL of Section 27, T23S-R30E, to an approximate bottom hole location 2240' FSL and 100' FWL of Section 28, T23S-R30E.

In **Case No. 24131,** Applicant seeks an order from the Division pooling all uncommitted mineral interests in the Delaware formation (Forty Niner Ridge; Delaware [24750]) in a standard 320-acre, more or less, HSU comprised of the N/2 S/2 of Sections 27 and 28, Township 23 South, Range 30 East in Eddy County, New Mexico. Applicant proposes to dedicate the HSU to the **Eeyore 27 28 ILL Fed Com 3H** well, to be horizontally drilled from an approximate surface hole location 1720' FSL and 330' FEL of Section 27, T23S-R30E, to an approximate bottom hole location 1720' FSL and 100' FWL of Section 28, T23S-R30E.

The first and last take points and completed interval will meet the setback requirements set forth in the statewide rules for horizontal oil wells.

Also to be considered in the above-referenced cases will be the cost of drilling and completing the well 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 well and lands are located approximately 13 miles East of Loving, New Mexico.

The only party sought to be pooled in this proceeding is WPX Energy Permian LLC.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Mitch Krakauskas, Landman	By affidavit	7-8
Michael Scott Kelley, Geologist	By affidavit	6-7

PROCEDURAL MATTERS

These applications are set for hearing on February 1, 2024. Assuming no opposition at the time of hearing, these cases 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 308144

QUESTIONS

Operator:	OGRID:
STRATA PRODUCTION CO	21712
P.O. Box 1030	Action Number:
Roswell, NM 882021030	308144
	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.	