

**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. 25487

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
SPENCER FANE LLP
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
(505) 986-2678
sshaheen@spencerfane.com
ec: dortiz@spencerfane.com

OTHER PARTIES

CONOCOPHILLIPS COMPANY

Elizabeth Ryan
Keri L. Hatley
CONOCOPHILLIPS
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
beth.ryan@conocophillips.com
keri.hatley@conocophillips.com

STATEMENT OF THE CASE

In **Case No. 25487**, Applicant in the above-styled cause 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 N/2 N/2 of Sections 27 and 28 , Township 23 South, Range 30 East in Eddy County, New Mexico. Applicant proposes to drill the following well: **Eeyore 27 28 ADL Fed Com #1H** well, to be horizontally drilled from an approximate surface hole location 920' FNL & 450' FEL of Section 27, T23S-R30E, to an approximate bottom hole location 920' FNL & 100' FWL of Section 28, T23S-R30E. The first and last take points and completed interval meet the setback requirements set forth in the statewide rules for horizontal oil wells. Also to be considered will be the cost of drilling and completing the well and the 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 application was filed July 7, 2025.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

Mitch Krakauskas, Landman

Scott Kelley

EXHIBITS

5-6

5-6

PROCEDURAL MATTERS

These applications are set for hearing on September 11, 2025. Assuming no opposition at the time of hearing, these cases will be presented by affidavit.

Respectfully submitted,

SPENCER FANE, LLP

By: /s/Sharon T. Shaheen

Sharon T. Shaheen

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 986-2678

sshaheen@spencerfane.com

cc: dortiz@spencerfane.com

Attorneys for STRATA PRODUCTION COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record, by electronic mail on September 4, 2025:

Elizabeth Ryan
Keri L. Hatley
CONOCOPHILLIPS
1048 Paseo de Peralta
Santa Fe, NM 87501
beth.ryan@conocophillips.com
keri.hatley@conocophillips.com

Attorneys for CONOCOPHILLIPS COMPANY

/s/ Sharon S. Shaheen
Sharon T. Shaheen

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 502931

QUESTIONS

Operator: STRATA PRODUCTION CO P.O. Box 1030 Roswell, NM 882021030	OGRID: 21712
	Action Number: 502931
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	2
Testimony time (in minutes)	Not answered.