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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF STRATA PRODUCTION COMPANY FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 14,746

AMENDED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Strata Production Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Strata Production Company P.O. Box 1030 Roswell, New Mexico 88202

Attention: Jo McInerny (575) 622-1127

APPLICANT'S ATTORNEY James Bruce

P.O. Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

<u>OPPONENT</u>

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Strata Production Company seeks an order approving a 320-acre non-standard oil spacing and proration unit (project area) in the Delaware formation comprised of the SE/4 of Section 14, E/2NE/4 of Section 23, and W/2NW/4 of Section 24, Township 23 South, Range 30 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Delaware formation underlying the SE/4 of Section 14, E/2NE/4 of Section 23, and W/2NE/4 of Section 24 to form a non-standard 320 acre oil spacing and proration unit (project area), for all pools or formations developed on 40 acre spacing within that vertical extent. The units are to be dedicated to the Sandy Fed. Well No. 2, a horizontal well with a surface location in the SW/4NW/4 of Section

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24, and a terminus in the NW/4SE/4 of Section 14. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Jo McInerny (landman) 15 min.

EST. TIME

EXHIBITS Approx. 6

Approx. 4

Approx. 2

20 min.

(geologist)

(engineer)

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

15 min.

Respectfully submitted,

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James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attorney for Strata Production Company