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ATTORNEYS & COUNSELORS AT LAW

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March 9, 1994

MAR 14 1994

VIA FACSIMILE TRANSMISSION TO 505/827-5741 AND REGULAR MAIL

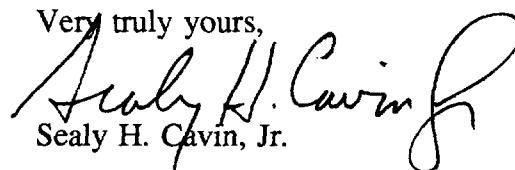
Mr. William J. LeMay  
Oil Conservation Division  
State Land Office Building  
310 Old Santa Fe Trail - Room 206  
Santa Fe, New Mexico 87105

**Re: Pre-Hearing Statement for Application of Strata Production Company for an  
Unorthodox Well Location, Eddy County, New Mexico -- Case No. 10936**

Dear Mr. LeMay:

On behalf of Strata Production Company, applicants in the above-described case, I am enclosing triplicate originals of the Pre-Hearing Statement which is filed in connection with the above-referenced case scheduled for public hearing before a Division Examiner on the Docket for Thursday, March 17, 1994.

Very truly yours,



Sealy H. Cavin, Jr.

SHC/skc

Enclosures

cc: Mark B. Murphy (w/encl.)  
President, Strata Production Company  
Kim Allison (w/encl.)  
Landman, Strata Production Company  
Jo McInerney (w/encl.)  
Landman, Strata Production Company  
Steve Mitchell (w/encl.)  
Geologist, Scott Exploration Inc.  
Bruce Stubbs (w/encl.)  
Petroleum Engineer, Pecos Petroleum Engineering, Inc.

**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:

CASE NO. 10936

APPLICATION OF STRATA PRODUCTION COMPANY  
FOR AN UNORTHODOX OIL WELL LOCATION,  
EDDY COUNTY, NEW MEXICO.

MAR 14 1994

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Strata Production Company  
Attn: Mark B. Murphy, President  
200 West First Street  
Roswell Petroleum Building, #700  
Roswell, New Mexico 88201

**ATTORNEY**

Stratton & Cavin, P.A.  
Sealy H. Cavin, Jr.  
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Albuquerque, New Mexico 87103-1216  
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**OPPOSITION OR OTHER PARTY**

**ATTORNEY**

Applicant is not aware of any opposition as of March 9, 1994.

## STATEMENT OF CASE

### APPLICANT

Strata Production Company seeks an Order Approving an Unorthodox Oil Well location to be drilled to a depth sufficient to test the Delaware formation, at a location 1230 feet from the north line and 1350 feet from the west line of Section 18, Township 23 South, Range 30 East, NMPM, Eddy County, New Mexico. The reasons for the unorthodox location include surface topography, a high pressure gas pipeline, potash restrictions, and geologic considerations.

### OPPOSITION OR OTHER PARTY

Applicant does not anticipate any opposition to the Application.

## PROPOSED EVIDENCE

### APPLICANT

<u>WITNESS</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Kim Allison Landman	15 minutes	Land plat, ownership, and notice.
Steve Mitchell Geologist	15 minutes	Geologic information regarding the application for and justification of an unorthodox well location request.

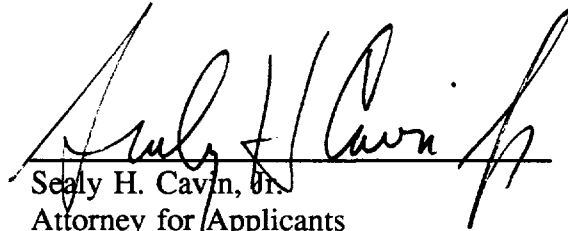
### OPPOSITION

<u>WITNESS</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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Applicant does not anticipate any opposition at the hearing.

## PROCEDURAL MATTERS

Applicant is not aware of any procedural matters which need to be addressed prior to the hearing.

A handwritten signature in black ink, appearing to read "Sealy H. Cavin", is written over a horizontal line.

Sealy H. Cavin, III  
Attorney for Applicants  
Stratton & Cavin, P.A.  
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Albuquerque, New Mexico 87103-1216  
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