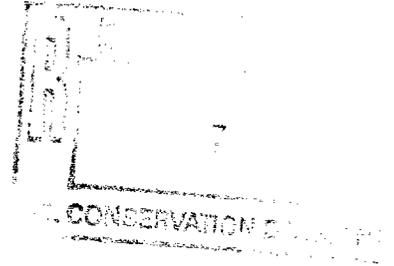


**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

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



IN THE MATTER OF THE APPLICATION OF  
INTERCOAST OIL AND GAS COMPANY  
FOR APPROVAL OF A UNIT AGREEMENT  
AND AN UNORTHODOX WELL LOCATION,  
LEA COUNTY, NEW MEXICO.

CASE NO. 11614

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A.,  
as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

InterCoast Oil and Gas Company  
c/o Rick Deffenbaugh  
7130 South Lewis Avenue, Suite 700  
Tulsa, OK 74136  
(918) 491-4105 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

William F. Carr, Esq. \_\_\_\_\_  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**STATEMENT OF CASE**

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

InterCoast Oil and Gas Company, applicant in the above-styled cause, seeks approval of the McMillan Exploratory Unit Agreement for an area comprising 160 acres of fee lands in Section 34 of Township 14 South, Range 38 East. Applicant also seeks approval of an unorthodox oil well location for its Savage 34-2 Well to be drilled 1275 feet from the North line and 2600 feet from the East line (Unit B) of said Section 34 with the NW/4 NE/4 of Section 34 to be dedicated to the well.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

**PROPOSED EVIDENCE**

APPLICANT

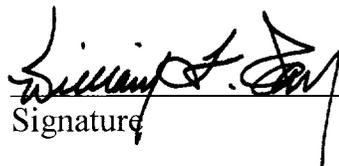
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Rick Deffenbaugh, Landman	10 Min.	Approximately 5
Mark Scott, Petroleum Geologist	10 Min.	Approximately 4

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing)

  
Signature