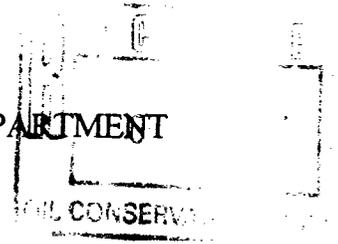


STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



IN THE MATTER OF THE APPLICATION
OF COBRA OIL & GAS CORPORATION
FOR A UNIT AGREEMENT,
LEA COUNTY, NEW MEXICO.

CASE NO. 11891

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

Cobra Oil & Gas Corporation
Post Office Box 3715
Midland, TX 79702
Attn: Charles House
(915) 683-9524

name, address, phone number
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

name, address and phone number
and contact person

ATTORNEY

STATEMENT OF CASE

APPLICANT

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

Cobra Oil & Gas Corporation, applicant in the above-captioned cause, seeks approval of the Henard Unit Agreement for an area comprising 80-acres, more or less, of fee lands comprising the SW/4 SE/4 (Unit O) of Section 23 and the NW/4 NE/4 (Unit B) of Section 26, both in Township 11 South, Range 37 East, which is located approximately 6 miles north of Gladiola, New Mexico. Applicant further seeks approval to drill the unit's initial well to the Undesignated Gladiola-Devonian Pool at an unorthodox oil well location 250 feet from the North line and 2300 feet from the East line (Unit B) of said Section 26.

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

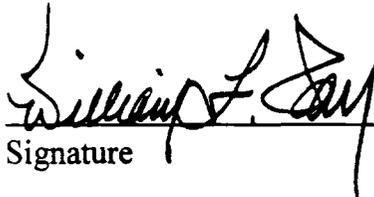
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
<u>Charles House</u> Landman	10 min.	Approximately 5
<u>Frank Wilson</u> Geologist	10 min.	Approximately 3

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	----------

PROCEDURAL MATTERS

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


Signature