

PADILLA LAW FIRM, P.A.

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RECEIVED

July 7, 1995

JUL 7 1995

Oil Conservation Division

HAND-DELIVERED

William LeMay  
Director  
New Mexico Oil Conservation Division  
P. O. Box 6429  
Santa Fe, New Mexico 87505

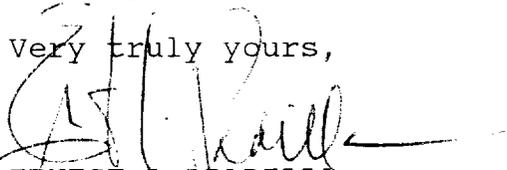
RE: CASE NO. 11319 - SULLIVAN AND COMPANY

Dear Mr. LeMay:

Enclosed for filing please find the original Pre-Hearing Statement in the above-referenced cause. The matter has been set for July 13, 1995.

Thank you.

Very truly yours,

  
ERNEST L. PADILLA

ELP:clm  
Enclosure: As indicated above  
xc: Sullivan and Company

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: The Application of  
Sullivan and Company "3D" Program I,  
L.L.C. for Directional Drilling and an  
Unorthodox Bottomhole Oil Well Location,  
Lea County, New Mexico

CASE NO. 11319

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Applicant as  
required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Sullivan and Company

ATTORNEY

Ernest L. Padilla  
PADILLA LAW FIRM, P.A.  
P. O. Box 2523  
Santa Fe, New Mexico  
87504-2523  
(505) 988-7577

OPPOSITION OR OTHER PARTY

No known opposition or attorney

ATTORNEY

PURPOSE OF HEARING

Applicant requests an unorthodox location for  
geological reasons which will be presented at hearing.

PROPOSED EVIDENCE

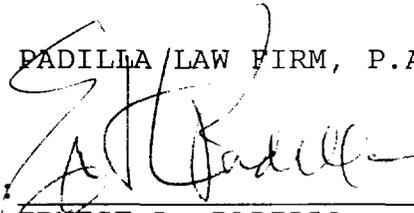
APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
MARC GARRETT Assistant Manager Production, Drilling & Exploration	10 min.	C-101 C-102 Land Plats
TOM ARMSTRONG Geologist	15 min.	Structure Map Cross-Section

PROCEDURAL/PRELIMINARY MATTERS

None

PADILLA LAW FIRM, P.A.

By: 

ERNEST L. PADILLA  
P. O. Box 2523  
Santa Fe, New Mexico  
87504-2523  
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ATTORNEY FOR SULLIVAN AND  
COMPANY