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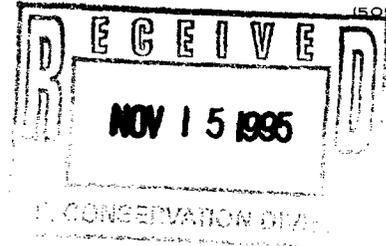
November 13, 1995

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HAROLD D. STRATTON, JR.†††  
SEALY H. CAVIN, JR.††††  
STEPHEN D. INGRAM†

\*ALSO ADMITTED IN OKLAHOMA  
†ALSO ADMITTED IN TEXAS  
\*\*ALSO ADMITTED IN COLORADO  
\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION  
RECOGNIZED SPECIALIST IN THE AREA OF  
NATURAL RESOURCES - OIL AND GAS LAW



VIA FACSIMILE TRANSMISSION TO 505/827-8177 AND REGULAR MAIL

Mr. William J. LeMay  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87105

**Re: Pre-Hearing Statement -- Case No. 10935 (Reopened)**

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, November 16, 1995.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sealy H. Cavin, Jr." with a stylized flourish at the end.

Sealy H. Cavin, Jr.

SHC/skc

Enclosures

cc: Mark B. Murphy (w/encl.)  
Bruce Stubbs (w/encl.)

**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 SPECIAL POOL RULES, FOR THE NASH DRAW  
BRUSHY CANYON DELAWARE POOL, EDDY  
COUNTY, NEW MEXICO.

CASE NO. 10935  
Reopened

RECEIVED

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Oil Conservation Division

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.  
Post Office Box 1216  
Albuquerque, New Mexico 87103-1216  
Telephone: (505) 243-5400

OPPOSITION OR OTHER PARTY

ATTORNEY

Applicant is not aware of any opposition as of November 13, 1995.

## STATEMENT OF CASE

### APPLICANT

Strata Production Company seeks an order promulgating special pool rules and regulations for the Nash Draw Brushy Canyon Delaware Pool, including a gas/oil ratio of 8,000 cubic feet of gas per barrel of oil produced.

### 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>
Bruce Stubbs Petroleum Engineer	30 minutes	1

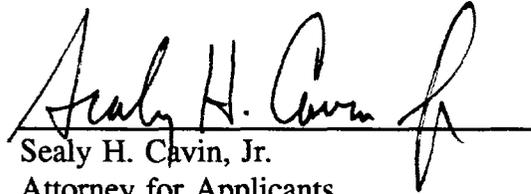
### OPPOSITION

<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, reading "Sealy H. Cavin, Jr.", written over a horizontal line.

Sealy H. Cavin, Jr.  
Attorney for Applicants  
Stratton & Cavin, P.A.  
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