

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
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ATTORNEY FOR SULLIVAN AND
COMPANY