

**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:

CASE NO. 12050

98 SEP 11 PM 12:07  
OIL CONSERVATION DIV.

IN THE MATTER OF THE APPLICATION  
OF STRATA PRODUCTION COMPANY  
FOR AN ORDER DIRECTING EXXON  
COMPANY, U.S.A. TO REMOVE AN  
OVERRIDING ROYALTY INTEREST FROM  
ACREAGE IN LEA COUNTY, NEW MEXICO.

**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**

Strata Production Company  
c/o Jo McInerney  
Post Office Drawer 1030  
Roswell, New Mexico 88202-1030  
(505) 822-1127

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**

Exxon Company, U.S.A.

name, address, phone and  
contact person

**ATTORNEY**

Jim Bruce, Esq.  
612 Old Santa Fe Trail, Suite B  
Santa Fe, New Mexico 87501  
(505) 982-2043

**STATEMENT OF CASE**

APPLICANT

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

Strata Production Company, applicant in the above-styled cause, seeks an order directing Exxon Company, U.S.A., to remove an overriding interest it created on certain interests in Section 22, Township 22 South, Range 32 East, that defeats the order the Division has been requested to enter in Case No. 12011 which compulsory pooled certain spacing and proration units in the W/2 of Section 22.

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

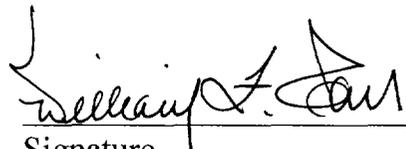
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jo McInerney, Land	20 Min.	Approximately 3

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

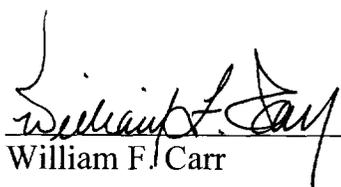
(Please identify any procedural matters which need to be resolved prior to hearing)

  
\_\_\_\_\_  
Signature

**CERTIFICATE OF MAILING**

I hereby certify that on this 11<sup>th</sup> day of September, 1998, I have caused to be mailed a copy of our Pre-Hearing Statement in the above-captioned cases to the following counsel of record:

Jim Bruce, Esq.  
Post Office Box 1056  
Santa Fe, New Mexico 87504

  
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William F. Carr