HAROLD D. STRATTON, JR.*+** SEALY H. CAVIN, JR.+*** STEPHEN D. INGRAM[†] CYNTHIA J. HILL*

* 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

STRATTON & CAVIN, P.A.

Attorneys & Counselors at Law 40 First Plaza Suite 610 Albuquerque, New Mexico 87102 TELEPHONE (505) 243-5400

FACSIMILE (505) 243-1700

MAILING ADDRESS P.O. BOX 1216 ALBUQUERQUE, NM 87103-1216 STRATCAV@AOL.COM

March 20, 2002

VIA FACSIMILE - 505/476-3462 and FEDERAL EXPRESS 824168059607

Michael E. Stogner, Hearing Examiner Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 1220 S. St. Francis Drive Santa Fe, NM 87504

Re: Case No. 12811
 Application of the New Mexico Oil Conservation Division for an Order Requiring Operators to Bring Three Hundred Eighty-Eight (388) Wells Into Compliance with Rule 201.B, and Assessing Appropriate Civil Penalties; Eddy, Chaves and Otero Counties, New Mexico

Dear Mr. Stogner:

We are submitting herewith Strata Production Company's Exhibit No. 1 which sets forth Strata's plans regarding the following four (4) wells operated by Strata:

1.	Obrien #1	Sec. 25, T7S - R29E	Chaves County, New Mexico
2.	Duncan Federal #1	Sec. 11, T16S - R30E	Eddy County, New Mexico
3.	Norman Federal #1	Sec. 14, T16S - R30E	Eddy County, New Mexico
4.	Remuda Basin "20" Federal #1	Sec. 20, T23S - R30E	Eddy County, New Mexico

We are also asking for a continuance of Case No. 12811 as to the wells operated by Strata so that we will have a chance to question the OCD witness, as appropriate. We are particularly concerned about the request for civil penalties. While I had planned to be at the hearing

Michael E. Stogner, Hearing Examiner Oil Conservation Division March 20, 2002 Page 2

scheduled for March 21st, I cannot attend the hearing now scheduled for March 22nd because of an all day hearing in Taos. Thank you for your consideration.

Very truly yours, h avin, Jr.

SHC/sks Enclosures

cc w/enc.: David Brooks, OCD General Counsel (Via Facsimile) Mark B. Murphy Bruce A. Stubbs, P.E.

PECOS PETROLEUM ENGINEERING, Inc. P.O. BOX 1794 200 W. FIRST ST., SUITE 536 ROSWELL, NEW MEXICO 88202 505-624-2800

7

March 18, 2002

Mr. Sealy H. Cavin, Jr. Stratton & Cavin, P.A. P.O. Box 1216 Albuquerque, New Mexico 87103-1216

Re: Oil Conservation Commission Case No. 12811 Compliance of inactive wells with Rule 201 Hearing scheduled for March 21, 2001

Dear Mr. Cavin:

The New Mexico Oil Conservation Commission has scheduled for hearing Case No. 12811on March 21, 2002 to consider and order requiring operators of 388 inactive wells to bring said wells into compliance with O.C.D. Rule 201. Included in this group of wells are four (4) wells operated by Strata Production Company. These wells are:

Obrien #1	Sec. 25, T7S-R29E	Chaves County, New Mexico
Duncan Federal #1	Sec. 11, T16S-R30E	Eddy County, New Mexico
Norman Federal #1	Sec. 14, T16S-R30E	Eddy County, New Mexico
Remuda Basin "20" Federal #1	Sec. 20, T23S-R30E	Eddy County, New Mexico

Strata has ask me to review these wells and determine if they can be returned to production, have any beneficial use or if they should be plugged and abandoned. The Obrien #1 has some potential in the San Andres, but would require recementing across the interval, stimulation and production equipment to enable the zone to produce. This well is a low priority well and there are no immediate plans to rework it. A plugging procedure has been submitted to the O.C.D. for approval and Mayo Mars Casing Pulling, Inc. has been contacted and the well has been placed on their schedule to be plugged during the first part of April.

The Duncan Federal #1 and the Norman Federal #1are capable of producing small volumes of low BTU gas, but the purchaser in the area won't set a meter for these low volume wells. There is no short term solution for this problem and Strata has no option except to plug and abandon these two (2) wells. Plugging procedures have been submitted to the BLM for approval and Mayo Mars Casing

Strata Production Company Exhibit No. 1 Case No. 12811 Pulling, Inc. has been contacted and the wells have been placed on their schedule to be plugged in mid April.

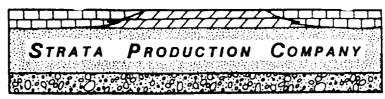
The Remuda Basin "20" Federal #1 is a depleted Brushy Canyon well and does not appear to have any other productive zones in the wellbore. Strata's future development in the Nash Draw Unit and the 49'r Ridge unit will necessitate additional water disposal capacity. While this capacity is not needed now, Strata is preparing an application to convert this well to SWD and will convert this well after approval of the SWD permit. I anticipate the completion of the permit during the week of March 25th.

Attached are copies of the plugging applications and the bid from Mayo Mars Casing Pulling, Inc. Should you need any additional information concerning these wells, please call me at 505-624-2800.

Sincerely,

Bruce A. Stubbs, P.E.

xc: Mark B. Murphy Strata Production Company POST OFFICE DRAWER 1030 ROSWELL, NM 88202-1030



TELEPHONE (505) 622-1127 FACSIMILE (505) 623-3533

200 WEST FIRST STREET, ROSWELL PETROLEUM BUILDING, SUITE 700 ROSWELL, NEW MEXICO 88203

March 14, 2002

Oil Conservation Division 1301 Grand Ave. Artesia, New Mexico 88210

Re: Form C-103 Sundry Notices O'Brien #1 Section 25-7S-29E Chaves County, New Mexico

Gentlemen:

For your review and approval, please find enclosed herewith one (1) original and three (3) copies of OCD Form C-103 for the Notice of Intent to Plug and Abandon the above referenced well.

Also attached are copies of BLM Form 3150-5 Sundry regarding the Abandonment of the Duncan Federal #1 and Norman Federal #1.

Should you require additional information regarding this matter, please contact this office.

Sincerely,

MGM. Britt

Kelly M. Britt Production Records

Enclosures

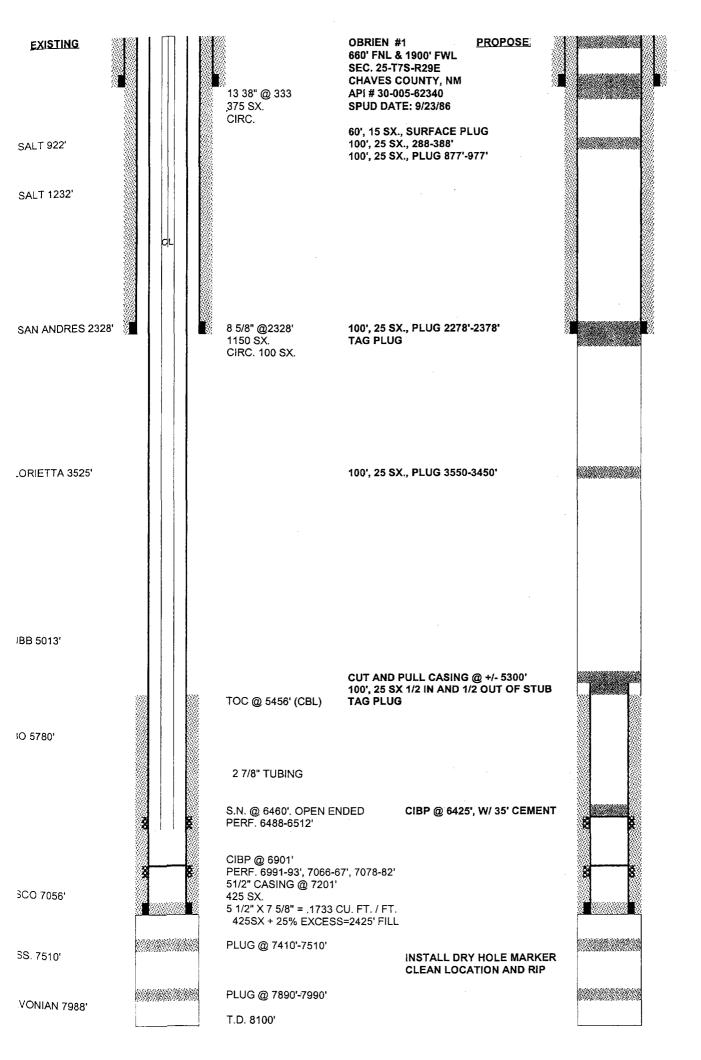
3 Copies State of New Mexico ropriate Energy, Minerals an atural Resource	es Department Form C-103 Revised 1-1-89
	SION
ICT I V. French Dr., Hobbs, NM 88240 I220 South St. Francis I Santa Fe, New Mexico 8	Dr. WELL API NO.
ICT II First Street, Artesia, NM 88210	5. Indicate Type of Lease STATE FEE X
ICT III jo Brazos Rd., Aztec, NM 87410	6. State Oil & Gas Lease No.
SUNDRY NOTICES AND REPORTS ON WELLS 10 NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BA DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)	
e of Well: . GAS LL WELL X OTHER	O'Brien
of Operator	8. Well No.
STRATA PRODUCTION COMPANY	#1
	9. Pool Name or Wildcat
P.O. BOX 1030, ROSWELL, NEW MEXICO 8820	2-1030 Miller Lake Abo
Unit Letter C : 660' Feet From The North	Line and 1900' Feet From The West Line
Section 25 Township 7S	Range 29E NMPM Chaves County
10. Elevation (Show whether DF, RK 4104'	B, RT, GR, etc.)
Check Appropriate Box to Indicate N	ature of Notice, Report, or Other Data
NOTICE OF INTENTION TO:	SUBSEQUENT REPORT OF:
)RM REMEDIAL WORK PLUG AND ABANDON X	REMEDIAL WORK
ORARILY ABANDON CHANGE PLANS	COMMENCE DRILLING OPNS.
OR ALTER CASING	CASING TEST AND CEMENT JOB
R:	OTHER:

escribe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) E RULE 1103

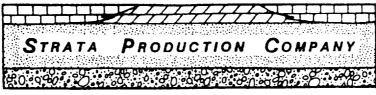
Set CIBP @ 6425', with 35' cement. Circulate hole with 9# mud. Cut and pull casing @ +/- 5300'. Spot 100' plug, 25 sx half in and half out of casing stub, tag plug. Spot 100' plug, 25 sx, 3550' -3450'. Spot 100' plug, 25 sx, 2278' - 2378', tag plug. Spot 100' plug, 25 sx, 877' - 977'. Spot 100' plug 25 sx, 288' - 388'. Spot 60', 15 sx surface plug. Install dryhole marker, clean location and rip.

(Attachment: Plugging Procedure)

by certify that the information above is true and complete to the best of my knowledge and belief.							
TURE C	KuymBritt_	TITLE	PRODUCTION RECORDS	date Ma	rch 14, 2002		
OR PRINT	NAME Kelly M. Britt			TELEPHONE NO.	505-622-1127		
pace for State U	Use)						
OVED BY	PPROVAL, IF ANY:	TITLE		DA	JTE		



POST OFFICE DRAWER 1030 ROSWELL, NM 88202-1030



TELEPHONE (505) 622-1127 FACSIMILE (505) 623-3533

200 WEST FIRST STREET, ROSWELL PETROLEUM BUILDING, SUITE 700 ROSWELL, NEW MEXICO 88203

March 14, 2002

Bureau of Land Management 2909 West Second Street Roswell, New Mexico 88201

Re: Form 3160-5 Sundry Notice: <u>Duncan Federal #1</u> Section 11-16S-30E Eddy County, New Mexico <u>Norman Federal #1</u> Section 14-16S-30E Eddy County, New Mexico

Gentlemen:

For your review and further handling, please find enclosed herewith one (1) original and five (5) copies of BLM Form 3160-5 Sundry Notices concerning the Notice of Intent of Abandonment on the above captioned wells.

Please return one approved copy of the same to this office for completion of our files. Should you require additional information, please advise.

Sincerely,

un marit

Kelly M. Britt Production Records

enclosures

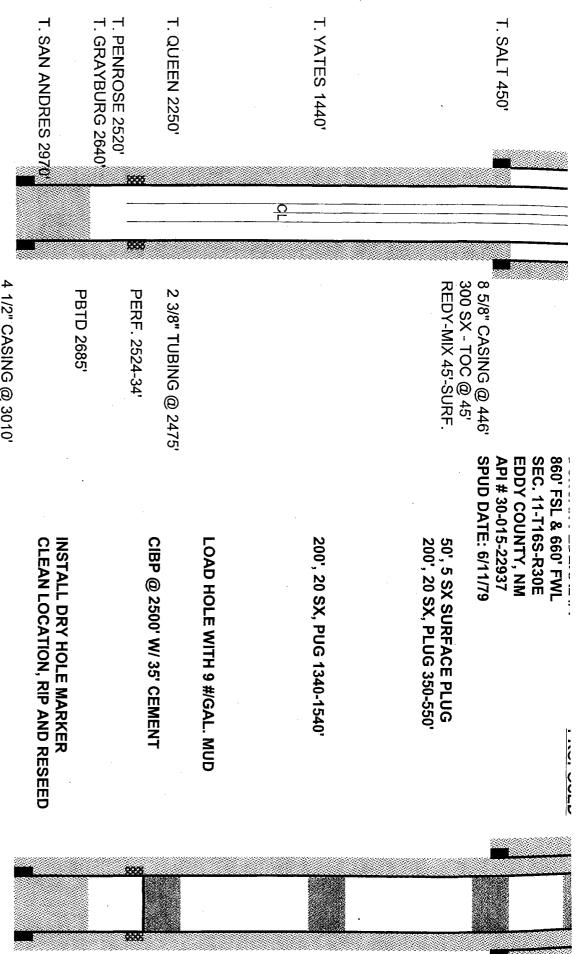
3160-5 3 1990)	UN DEPARTME BUREAU O	FORM APPROVED Budget Bureau No. 1004-0135 Expires: March 31, 1993 5. Lease Designation and Serial No.			
++++++		AND REPORTS ON WELLS	NM - 11814		
Do not use this form fo	or proposals to	frill or to deepen or reentry to a different reservoir.	6. If Indian, Allottee or Tribe Name		
Use ",	APPLICATION	FOR PERMIT-" for such proposals			
	SUBN	IIT IN TRIPLICATE	7. If Unit or CA, Agreement Designation		
be of Well iii Gas /ell Well X Other me of Operator			8. Well Name and No. Duncan Federal		
	STRATA PF	ODUCTION COMPANY	9. API Well No.		
dress and Telephone No.	30 Mexico 88202-1030 505-622-1127	#1 10. Field and Pool, or Exploratory Area			
ation of Well (Footage, Sec., T.,	R., M., or Survey D	escription)	Henshaw - Q - G - SA		
	860' FSL & 660)' FWL	11. County or Parish, State		
	Section 11-168	3-30E	Eddy		
CHECK APPROP	RIATE BOX	(s) TO INDICATE NATURE OF NOTICE, F	EPORT, OR OTHER DATA		
TYPE OF SUBMISSI	ON	TYPE OF ACTION			
X Notice of Intent Subsequent Report Final Abandonment N	lotice	X Abandonment Recompletion Plugging Back Casing Repair Altering Casing	Change of Plans New Construction Non-Routine Fracturing Water Shut-Off Conversion to Injection		
wribe Proposed or Completed Operati e subsurface locations and measured	ions (Clearly state all g and true vertical depins	Other	Dispose Water (Note: Report results of multiple completion on Well Completion or Recompletion Report and Log Form.) proposed work. If well is directionally drilled,		

Set CIBP @ 2500' w/35' cement. Circulate hole with 9#/Gal mud. Spot 200' plug, 20 sx, 1340' - 1540'. Spot 200' plug, 20 sx 350' - 550'. Spot 50' plug, 5 sx surface plug. Install dry hole marker. Clean location, rip and reseed.

(Attachment: Plugging Procedure)

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hereby certify that the foregoing is true and correct				
med Kellymbritt	Title	Production Records	Date	March 14, 2002
his space for Federal or State office use)				
proved by nditions of approval, if any:	_ Title	I	Date	
e 18 U.S.C. Section 1001, makes it a crime for any person knowingly and epresentations as to any matter within its jurisdiction.	willfully	y to make to any department or agency of the United State	s any f	false, fictitious or fraudulent statements
	* Se	e Instruction on Reverse Side		F3160-5.WK1



4 1/2" CASING @ 3010' 400 SX. HLC & 200 SX 50/50 POZMIX 4 1/2" X 7 5/8" = .2278 CU. FT. / FT. 600SX + 25% EXCESS=3100' FILL

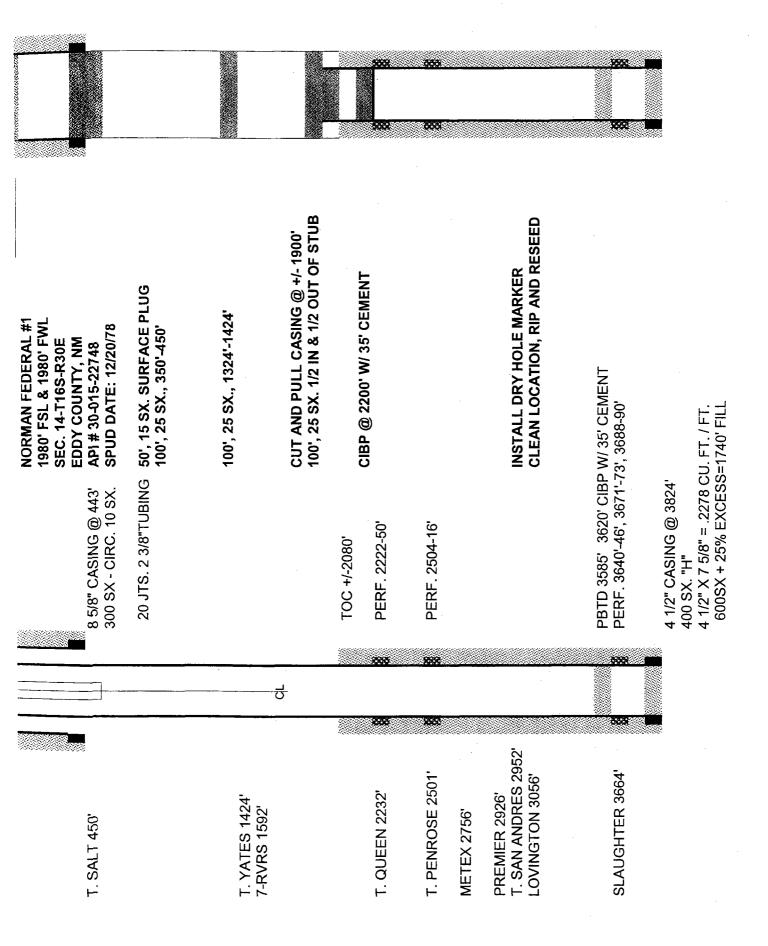
3160-5 E 1990)	DEPARTME	TE, STATES NT OF THE INTERIOR F LAND MANAGEMENT	FORM APPROVED Budget Bureau No. 1004-0135 Expires: March 31, 1993 5. Lease Designation and Serial No.		
SUNE Do not use this form Use	NM - 11327 6. If Indian, Allottee or Tribe Name				
	SUBN	IIT IN TRIPLICATE	7. If Unit or CA, Agreement Designation		
pe of Well Jil Gas Vell Well X Other			8. Well Name and No.		
me of Operator	STRATA DO	ODUCTION COMPANY	Norman Federal 9. API Well No.		
N	P. O. Box 103		#1		
dress and Telephone No.		Mexico 88202-1030 505-622-1127	10. Field and Pool, or Exploratory Area		
cation of Well (Footage, Sec.,	T., R., M., or Survey De	scription)	Henshaw Q-G-SA		
1980'	FSL and 1980'	FWL	11. County or Parish, State		
Sectio	on 14-16S-30E		Eddy		
CHECK APPRO	PRIATE BOX	s) TO INDICATE NATURE OF NOTICE,	REPORT, OR OTHER DATA		
TYPE OF SUBMISS	SION	TYPE OF ACTION			
X Notice of Intent		X Abandonment Recompletion	Change of Plans New Construction		
Subsequent Report		Plugging Back Casing Repair	Non-Routine Fracturing Water Shut-Off		
Final Abandonment Notice		Altering Casing	Conversion to Injection		
		Other	Dispose Water (Note: Report results of multiple completion on Well Completion or Recompletion Report and Log Form.)		
scribe Proposed or Completed Ope	rations (Clearly state all ne	rtinent details, and give pertinent dates, including estimated date of starting a	ny proposed work. If well is directionally drilled.		

ng any propo uly e subsurface locations and measured and true vertical depths for all markers and zones pertinent dates, including es

Set CIBP @ 2200' with 35' cement. Circulate hole with 9# mud. Cut and pull casing at +/- 1900'. Spot 100' plug, 25 sx, half in and half out of casing stub. Spot 100' plug, 25 sx, 1324' - 1424'. Spot 100' plug, 25 sx, 350' - 450'. 50', spot 15 sx surface plug. Install dry hole marker. Clean location, rip and reseed.

(Attachment: Plugging Procedure)

hereby certify that the foregoing is true and correct		
ined KullymBritt	Title Production Reco	rds Date March 14, 2002
is space for Federal or State office use)		
proved by nditions of approval, if any:	Title	Date
e 18 U.S.C. Section 1001, makes it a crime for any person k epresentations as to any matter within its jurisdiction.	nowingly and willfully to make to any department or	agency of the United States any false, fictitious or fraudulent statements
	* See Instruction on Rever	rse Side F3160-5 WK1



MAYO MARRS CASING PULLING, INC. P.O. Box 863 Kermit, Tx. 79745 915-586-3076 03-14-02

STRATA PRODUCTION COMPANY PO. BOX 1030 ROSWELL, N.M. 88202 Attn: BRUCE STUBBS

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PHONE 505-624-2800 FAX 505-623-1777

Dear Mr. Stubbs

Mayo Marrs Casing Pulling Inc. would like to submit an offer to P&A as follows:

O'BRIEN # 1		\$ 11,830.00
		\$ 8,490.00
DUNCAN FED. # 1	• • • • • • • • • • •	\$ 5,380.00

SALVAGE WOULD BE CREDITED BACK @ THE FOLLOWING RATES: 2 7/8" TUBING @ \$.85/FT 2 3/8" TUBING @ \$.45/FT 4 1/2" CASING @ \$ 1.25/FT 5 1/4" CASING @ \$ 2.15/FT

A RESPONSIBILITY SHEET IS ATTACHED.

ANY CHANGES DUE TO OCD, BLM OR STRATA WOULD BE BILLED FROM OUR CURRENT RATES.

We do appreciate the opportunity to furnish this bid and look forward to any help we may be.

Sincerely, **Rickey Smith**

Obrien Bulis Norman + Duncan Sules

Mayo Marts Casing Pulling Inc. Materials for Turnkey bid

OPERATOR: STRATA WELL: DUNCAN FED. #1 DATE: 03-14-2002 Mayo Marrs Operator Cement Per 45 Sacks Salt gcl 35 Sacks X CaCl Sacks · · · · Fresh Water X___ 50 Bbls Brine Water 130 Bblsx ___X___ Pump Truck X CIBP X Packers Retainers Pulling unit & tubing tongs Elevators, slips, bowlsX___X Casing longs thru 9 5/8X_ Hydraulic jacks thru 9 5/8 Welding as per proceedure X Casing cut nitro 1 Casing cut jet cutter 1 _.... AS REQUIRED Perforating Tubing Workstring AS REQUIRED ___X__ **B**.0.P. thru 2 7/8 Equipment rentals if needed **FISHING TOOL**, ETC. Dig working pit ----Cover working pit <u>X</u> Dry Hole Marker <u>X</u> X Site preparation with anchors Salvage removal (Mayo Marrs) Salvage removal (Company) Х Miscellaneous:

1. This bid is valid for ninety days from date of letter.

2. This bid is based on information provided by operator, any changes made by the operator, RRC, BLM or New Mexico OCD will be billed from our price sheets.

3. Not responsible for additional trucking due to lost circulation, water flows or

disposal of pit fluids. Amount of Water furnished as to bid.

4. Land reclamation is the responsibility of operator.

MAYO MARRS CASING PULLING INC.

Mayo Marrs Casing Pulling Inc. Materials for Turnkey bid

WELL: NORMAN FED. #1 DATE: 03-14-2002 Mayo Marrs Operator Cement Pcr 90 Sacks <u>X</u> Salt gel X 45 Sacks CaCl Sacks · · · · _ ____ <u>X</u> Fresh Water 50 Bbls Brine Water 190 Bbls X Pump TruckX_ CIBP X Packers Retainers Pulling unit & tubing tongs Х Elevators, slips, bowls X Casing tongs thru 9 5/8 **__X**__ Hydraulic jacks thru 9 5/8 Welding as per proceedure ...Х Casing cut nitro l ..., Х 1____ Casing cut jet cutter X AS REQUIRED Perforating Tubing Workstring AS REQUIRED X B.O.P. thru 2 7/8 X Equipment rentals if needed FISHING TOOL, ETC. Dig working pitX____X___ Cover working pit <u>X</u> Dry Hole MarkerX____X Site preparation with anchors Salvage removal (Mayo Marrs) Salvage removal (Company) Miscellancous:

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MAYO MARRS CASING PULLING INC.

OPERATOR: STRATA

OPERATOR: STRATA

Mayo Marts Casing Pulling Inc. Materials for Turnkey bid

WELL: O'BE		n		
DATE: 03-14	-2002		Mayo Marrs	Operator
Cement Per	14	5 Sacks	X	
Salt gel	8.	5 Sacks	· · · · ·X	
CaCl	Sa	cks		
Fresh Water	50	Bbls	<u>X</u>	
Brine Water	190	Bbls	<u> </u>	
Pump Truck			x	<u> </u>
CIBP			_x	
Packers			· · · · ·	
Retainers				
Pulling unit &	tubing to	ongs	<u>_x</u>	-,
Elevators, slips	,bowls	-	X	
Casing tongs th	hru 9 5/8		X_	=
Hydraulic jack			X	= <u></u> _
Welding as per	r proceed	ure	<u>_x_</u>	
Casing cut nitr	้ง		!x	
Casing cut jet of			X	
Perforating	AS	REOUR	ED	
Tubing Works	tring AS	REQUIRI	D	
B.0.P. thru 2 7/	/8	· ·	X	<u>_</u>
Equipment ren	tals if ne	eded	FISHING TOO	L,ETC. X
Dig working pi	it		<u>x</u>	_,
Cover working	pit		<u>x</u>	
Dry Hole Mark	ler		_ x	
Site preparation	n with an	chors	····	<u> </u>
Salvage remov			<u>x</u>	
Salvage remova				<u> </u>
Miscellaneous:		• •		

1. This bid is valid for nincty days from date of letter.

2. This bid is based on information provided by operator, any changes made by the operator, RRC, BLM or New Mexico OCD will be billed from our price sheets.

3. Not responsible for additional trucking due to lost circulation, water flows or

disposal of pit fluids. Amount of Water furnished as to bid.

4. Land reclamation is the responsibility of operator.

MAYO MARRS CASING PULLING INC.

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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

CASE NO. 12811

APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION FOR AN ORDER REQUIRING OPERATORS TO BRING THREE HUNDRED EIGHTY-EIGHT (388) WELLS INTO COMPLIANCE WITH RULE 201.B, AND ASSESSING APPROPRIATE CIVIL PENALTIES, EDDY, CHAVES AND OTERO COUNTIES, NEW MEXICO.

MOTION FOR CONTINUANCE

Strata Production Company by and through its attorney, Sealy H. Cavin, Jr., requests that the Oil Conversation Division continue case number 12811 to April 4, 2002 hearing as to the wells operated by Strata Production Company.

RESPECTFULLY SUBMITTED,

STRATTON & CAVIN, P.A.

Bv: Sealy H. Cavin/Jr.

Attorneys for Strata Production Company Post Office Box 1216 Albuquerque, New Mexico 87103 Telephone: (505) 243-5400

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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

CASE NO. 12811

APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION FOR AN ORDER REQUIRING OPERATORS TO BRING THREE HUNDRED EIGHTY-EIGHT (388) WELLS INTO COMPLIANCE WITH RULE 201.B, AND ASSESSING APPROPRIATE CIVIL PENALTIES, EDDY, CHAVES AND OTERO COUNTIES, NEW MEXICO.

ORDER GRANTING MOTION FOR CONTINUANCE

CAME ON TO BE HEARD on March 20, 2002 the Motion for Continuance submitted by Sealy H. Cavin, Jr. on behalf of Strata Production Company be granted, and that such case be continued to the April 4, 2002 hearing as to the wells operated by Strata Production Company.

> MICHAEL E. STOGNER Hearing Examiner