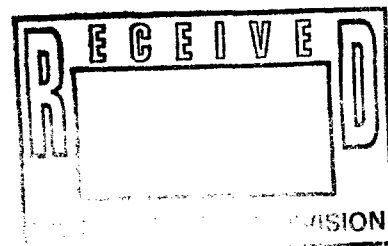


**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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

CASE NO. 10980

APPLICATION OF ODYSSEY PARTNERS, LTD.
FOR A UNIT AGREEMENT AND AN
UNORTHODOX OIL WELL LOCATION,
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

Odyssey Partners, Ltd. _____
c/o Philip R. "Rusty" Rice _____
Post Office Box 8308 _____
Dallas, TX 75205-8303 _____
(214) 696-1762 _____
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

name, address, phone and
contact person

ATTORNEY

STATEMENT OF CASE

APPLICANT

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

Odyssey Partners, Ltd., applicant in the above-captioned cause, seeks approval of the Marigold Unit Agreement for an are comprising 80-acres of Federal and Fee lands consisting of the SW/4 SE/4 of Section 6 and the NW/4 NE/4 of Section 7, both in Township 12 South, Range 38 East. Also, applicant seeks approval for an unorthodox oil well location to be drilled 100 feet from the North line and 2075 feet from the East line (Unit B) of said Section 7, whereby the NW/4 NE/4 of said Section 7 is to be dedicated to the well to form a standard 40-acre oil spacing and proration unit for said well. Applicant further requests approval of the unorthodox oil well location as to all prospective pools and/or formations being developed on 40-acre spacing including but not necessarily limited to the Devonian formation.

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

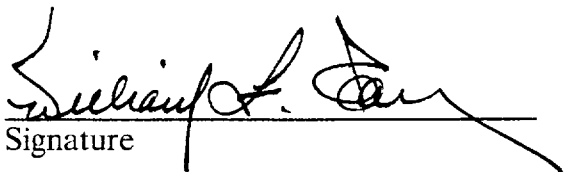
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Philip Rice, Land	5 Min.	Approximately 2
Jack Ahlen, Geologist	15 Min.	Approximately 5

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
--	------------------	-----------------

PROCEDURAL MATTERS

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


Signature