

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. 10235

APPLICATION OF STRATA ENERGY RESOURCES  
CORPORATION FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by STRATA  
ENERGY RESOURCES CORPORATION as required by the Oil  
Conservation Division.

APPEARANCE OF PARTIES

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

Strata Energy Resources Corp.  
280202 Cabot Rd, Ste. 250  
Laguna Niguel, CA 92677  
Attn: Ray Diaz  
(714) 365-0100

Karen Aubrey  
KELLAHIN, KELLAHIN & AUBREY  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

OPPOSITION OR OTHER PARTY  
(name, address, phone  
and contact person)

ATTORNEY

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OIL CONSERVATION DIV  
SANTA FE

**STATEMENT OF CASE**

APPLICANT

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

Strata Energy Resources Corporation seeks an order pooling all mineral interests from the surface to the base of the Abo formation underlying the following described acreage in Section 14, T19S, R38E: The SW/4NE/4 to form a standard 40-acre oil spacing and proration unit for any and all formations and/or pools developed on 40-acre spacing within said vertical extent, which presently includes but is not necessarily limited to the Undesignated Nadine Drinkard-Abo Pool and Undesignated Hobbs Grayburg-San Andres Pool; and the NE/4 to form a standard 160-acre gas spacing and proration unit for any and all formations and/or pools developed on 160-acre spacing within said vertical extent, which presently includes but is not necessarily limited to the Undesignated Nadine-Yates Gas Pool. Said units are to be dedicated to a single well to be drilled at a standard location thereon.

Strata has sought the voluntary agreement of the owners of the non-consenting working interests for the formation of appropriate spacing and proration units, and has been unable to obtain voluntary agreement.

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
Dan Thorsen (landman)		Surface ownership plat
Jeff Smith or Don Turner (geologist)		Tabulation of interest owners Copies of correspondence Operating agreement AFE Structure map Cross-section map Production map Economic calculations

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 the hearing)

KELLAHIN, ~~KELLAHIN~~ & AUBREY

By: 

Karen Aubrey

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