

**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:

IN THE MATTER OF THE APPLICATION OF
INTERCOAST OIL AND GAS COMPANY
FOR APPROVAL OF A UNIT AGREEMENT
AND AN UNORTHODOX WELL LOCATION,
LEA COUNTY, NEW MEXICO.

CASE NO. 11614

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

InterCoast Oil and Gas Company
c/o Rick Deffenbaugh
7130 South Lewis Avenue, Suite 700
Tulsa, OK 74136
(918) 491-4105

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.)

InterCoast Oil and Gas Company, applicant in the above-styled cause, seeks approval of the McMillan Exploratory Unit Agreement for an area comprising 160 acres of fee lands in Section 34 of Township 14 South, Range 38 East. Applicant also seeks approval of an unorthodox oil well location for its Savage 34-2 Well to be drilled 1275 feet from the North line and 2600 feet from the East line (Unit B) of said Section 34 with the NW/4 NE/4 of Section 34 to be dedicated to the well.

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

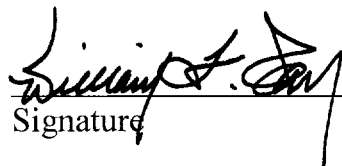
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Rick Deffenbaugh, Landman	10 Min.	Approximately 5
Mark Scott, Petroleum Geologist	10 Min.	Approximately 4

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