

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

**APPLICATIONS OF OXY USA INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 23430-23431

OXY'S CONSOLIDATED PRE-HEARING STATEMENT

OXY USA Inc. ("OXY") (OGRID No. 16696) submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

OXY USA Inc.

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Paula M. Vance, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
TEL: (505) 988-4421
FAX: (505) 983-6043

APPLICANT'S STATEMENT OF CASE

In **Case No. 23430**, Applicant seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 1,002.32-acre, more or less, horizontal well spacing unit comprised of the W/2 of Sections 19, 30, and 31 all in Township 21 South, Range 32 East (NMPM), Lea County New Mexico. This spacing unit will be initially dedicated to the following proposed wells:

- **Regal Lager 31 19 Fed Com 31H, 32H and 33H** wells to be drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 31, Township 21 South, Range 32 East, to

bottom hole locations in the NW/4 NW/4 (Lot 1) and NE/4 NW/4 (Unit C) of Section 19, Township 21 South, Range 32 East.

The completed interval of the **Regal Lager 31 19 Fed Com 32H well** is expected to remain within 330 feet of the offsetting quarter-quarter sections or equivalent tracts to include them in a standard horizontal well spacing unit.

In **Case No. 23430**, Applicant seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 960-acre, more or less, horizontal well spacing unit comprised of the E/2 of Sections 19, 30, and 31 all in Township 21 South, Range 32 East (NMPM), Lea County New Mexico. This spacing unit will be initially dedicated to the following proposed wells:

- **Regal Lager 31 19 Fed Com 34H, 35H and 36H** wells to be drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 6, Township 22 South, Range 32 East, to bottom hole locations in the NW/4 NE/4 (Unit B) and NE/4 NE/4 (Unit A) of Section 19, Township 21 South, Range 32 East.

The completed interval of the **Regal Lager 31 19 Fed Com 35H well** is expected to remain within 330 feet of the offsetting quarter-quarter sections or equivalent tracts to include them in a standard horizontal well spacing unit.

Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject spacing units. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Courtney Carr, Landman	Statement	Approx. 5
Daniel Burnett, Geologist	Statement	Approx. 4

PROCEDURAL MATTERS

OXY requests that these cases be consolidated for purposes of presenting them at hearing and anticipates presenting these cases by self-affirmed statements if they remain unopposed.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
P.O. Box 2208
Santa Fe, NM 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR OXY USA INC.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 202300

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 202300
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.