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

# APPLICATION OF OXY USA INC. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

#### CASE NO. 23430

#### **OXY'S CONSOLIDATED PRE-HEARING STATEMENT**

OXY USA Inc. ("OXY") (OGRID No. 16696) provides notice that has filed the attached **Revised OXY Exhibit A** in Case No. 23430 correctly reflecting the acreage dedicated to this spacing unit is 1,002.32 acres, more or less. OXY requests that the Revised Exhibit be admitted

and accepted into the record and that the case be taken under advisement.

Respectfully submitted,

HOLLAND & HART LLP

By:

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ATTORNEYS FOR OXY USA INC.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on May 18, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Sharon T. Shaheen William McGinnis Montgomery & Andrews, P.A. Post Office Box 2307 Santa Fe, New Mexico 87504-2307 (505) 986-2678 sshaheen@montand.com wmcginnis@montand.com

Attorneys for Fasken Oil & Ranch

Adam G. Rankin

ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS	
Case: 23430	APPLICANT'S RESPONSE
Date	April 20, 2023
Applicant	OXY U.S.A. Inc.
Designated Operator & OGRID (affiliation if applicable)	OGRID No. 16696
Applicant's Counsel:	Holland & Hart LLP
Case Title:	APPLICATION OF OXY USA INC.
	FOR COMPULSORY POOLING,
	EDDY COUNTY, NEW MEXICO.
Entries of Appearance/Intervenors:	Fasken
Well Family	Regal Lager 31 19 Fed Com
Formation/Pool	
Formation Name(s) or Vertical Extent:	Wolfcamp formation
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Wolfcamp formation
Pool Name and Pool Code:	WC-025 G-09 S213232A; UPR Wolfcamp (98313)
Well Location Setback Rules:	Statewide
Spacing Unit	
Type (Horizontal/Vertical)	Horitzontal
Size (Acres)	1002.32-acre, more or less
Building Blocks:	40-acre
Orientation:	South to North
Description: TRS/County	W/2 of Sections 19, 30, and 31 all in Township 21
	South, Range 32 East (NMPM), Lea County New
Standard Harizantal Wall Spacing Hait (V/N) If No. describe	Mexico. Yes
Standard Horizontal Well Spacing Unit (Y/N), If No, describe and is approval of non-standard unit requested in this	res
application?	
Other Situations	
Depth Severance: Y/N. If yes, description	No
Proximity Tracts: If yes, description	Yes; 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
Proximity Defining Well: if yes, description	horizontal well spacing unit. Regal Lager 31 19 Fed Com 32H
Applicant's Ownership in Each Tract	Exhibit C-2

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Name & API (if assigned), surface and bottom hole location,	Add wells as needed
footages, completion target, orientation, completion status (standard or non-standard)	
Well #1	Regal Lager 31 19 Fed Com 31H
	SHL: 304' FSL, 2599' FWL (Unit N), S31, R21S, T32E
	BHL: 20' FNL, 440' FWL (Lot 1), S19, R21S, T32E
	Completion Target: Wolfcamp formation
	Orientation: south to north
	Completion status is expected to be standard
Well #2	Regal Lager 31 19 Fed Com 32H
	SHL: 303' FSL, 2629' FWL (Unit N), S31, R21S, T32E BHL: 20' FNL, 1255' FWL (Lot 1), S21, R19S, T32E
	Completion Target: Wolfcamp formation Orientation: south to north
	Completion status is expected to be standard
Well #3	Regal Lager 31 19 Fed Com 33H
	SHL: 303' FSL, 2659' FWL (Unit N), S31, R21S, T32E
	BHL: 20' FNL, 2180' FWL (Lot 1), S19, R21S, T32E
	Completion Target: Wolfcamp formation
	Orientation: south to north
	Completion status is expected to be standard
Horizontal Well First and Last Take Points	Exhibit C-3
Completion Target (Formation, TVD and MD)	Exhibit C-3
AFE Capex and Operating Costs	
Drilling Supervision/Month \$	N/A
Production Supervision/Month \$	N/A
Justification for Supervision Costs	N/A
Requested Risk Charge	N/A
Notice of Hearing	
Proposed Notice of Hearing	Exhibit B
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibit E
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit F
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	Exhibit C-2
Tract List (including lease numbers and owners)	Exhibit C-2
If approval of Non-Standard Spacing Unit is requested, Tract	
List (including lease numbers and owners) of Tracts subject to	
notice requirements.	N/A
Pooled Parties (including ownership type)	Exhibit C-2

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Unlocatable Parties to be Pooled	N/A
Ownership Depth Severance (including percentage above & below)	N/A
Joinder	
Sample Copy of Proposal Letter	Exhibit C-3
List of Interest Owners (ie Exhibit A of JOA)	Exhibit C-2
Chronology of Contact with Non-Joined Working Interests	Exhibit C-4
Overhead Rates In Proposal Letter	Exhibit C-3
Cost Estimate to Drill and Complete	Exhibit C-3
Cost Estimate to Equip Well	Exhibit C-3
Cost Estimate for Production Facilities	Exhibit C-3
Geology	
Summary (including special considerations)	Exhibit D
Spacing Unit Schematic	Exhibit D-1
Gunbarrel/Lateral Trajectory Schematic	N/A
Well Orientation (with rationale)	Exhibit D
Target Formation	Exhibit D-3
HSU Cross Section	Exhibit D-3
Depth Severance Discussion	N/A
Forms, Figures and Tables	
C-102	Exhibit C-1
Tracts	Exhibit C-2
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit C-2
General Location Map (including basin)	Exhibit D-1
Well Bore Location Map	Exhibit D-1
Structure Contour Map - Subsea Depth	Exhibit D-2
Cross Section Location Map (including wells)	Exhibit D-3
Cross Section (including Landing Zone)	Exhibit D-3
Additional Information	
Special Provisions/Stipulations	N/A
CERTIFICATION: I hereby certify that the information pro	ovided in this checklist is complete and accurate.
Printed Name (Attorney or Party Representative):	Adam G. Rankin
Signed Name (Attorney or Party Representative):	-
Date:	18-May-23