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

APPLICATION OF OXY USA INC. FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 16338

APPLICATION OF OXY USA INC. FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 16339

OXY'S PRE-HEARING STATEMENT

This pre-hearing statement is submitted by OXY USA Inc. ("OXY") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT	ATTORNEY
ALLUCANI	AIIVINI

OXY USA Inc. Michael H. Feldewert

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STATEMENT OF THE CASE

In Case No. 16338, OXY seeks an order (1) creating a 320.08-acre non-standard spacing and proration unit comprised of the W/2 E/2 of Section 34, Township 23 South, Range 31 East, NMPM, and Lot 2, SW/4 NE/4, W/2 SE/4 [W/2 E/2] of Section 3, Township 24 South, Range 31

East, Eddy County, New Mexico; and (2) pooling all uncommitted interests in the Ingle Wells; Bone Spring (Pool Code 33740) underlying this acreage. OXY proposes to dedicate the above-referenced spacing and proration unit as the project area for its **Platinum MDP1 "34-3" Federal Com No. 4H Well** which will be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 34, Township 23 South, Range 31 East, NMPM, to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 3, Township 24 South, Range 31 East, NMPM. The completed interval for this well will comply with Statewide Rules set forth in 19.15.15 NMAC.

In Case No. 16339, OXY seeks an order (1) creating a 320.03-acre non-standard spacing and proration unit comprised of the E/2 E/2 of Section 34, Township 23 South, Range 31 East, NMPM, and Lot 1, SE/4 NE/4, E/2 SE/4 [E/2 E/2] of Section 3, Township 24 South, Range 31 East, Eddy County, New Mexico; and (2) pooling all uncommitted interests in the Ingle Wells; Bone Spring (Pool Code 33740) underlying this acreage. OXY proposes to dedicate the above-referenced spacing and proration unit as the project area for its **Platinum MDP1 "34-3" Federal Com No. 5H Well** and **Platinum MDP1 "34-3" Federal Com No. 6H Well** which will be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 34, Township 23 South, Range 31 East, NMPM, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 3, Township 24 South, Range 31 East, NMPM. The completed intervals for each well will comply with Statewide Rules set forth in 19.15.15 NMAC.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
India Isbell, Landman	Approx. 20 minutes	Approx. 6
Tyler Evans, Geology	Approx. 15 minutes	Approx. 5

PROCEDURAL MATTERS

OXY requests that Case Nos. 16338 and 16339 be consolidated only for hearing purposes.

Respectfully submitted,

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