

Jones, William V., EMNRD

From: Ezeanyim, Richard, EMNRD
Sent: Monday, December 14, 2009 9:53 AM
To: Jones, William V., EMNRD
Subject: FW: Case 14412
Attachments: Reliant-PHS-Case 14412.PDF

Will:

FYI

From: Davidson, Florene, EMNRD
Sent: Monday, December 14, 2009 9:07 AM
To: Ezeanyim, Richard, EMNRD
Subject: FW: Case 14412

From: Thomas Kellahin [mailto:tkellahin@comcast.net]
Sent: Thursday, December 10, 2009 3:39 PM
To: Davidson, Florene, EMNRD
Cc: Earl E. DeBrine; BILL CARR
Subject: Case 14412

Dear Florene,

Please find attached for filing our pre-hearing statement on behalf of Reliant Exploration and Production, L.L.C. for Case 14412 currently set for hearing on the December 17th OCD docket.

Thanks,

Tom Kellahin

Kellahin & Kellahin
Attorneys at Law
706 Gonzales Road
Santa Fe, NM 87501
ph 505.982.4285
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WVJ 12/14/09

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

IN THE MATTER OF THE APPLICATION OF RELIANT
EXPLORATION AND PRODUCTION LLC,
FOR CANCELLATION OF TWO PERMITS TO DRILL
("APD") ISSUED TO OXY USA, INC. AND FOR
COMPULSORY POOLING IN HARDING COUNTY,
NEW MEXICO.

CASE NO. 14412

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Reliant Exploration and
Production LLC, ("Reliant" or "Applicant") as required by the Oil Conservation
Division Rule 19.15.14.1211(B).

APPEARANCES

APPLICANT:

Reliant Exploration and Production Company, LLC,

ATTORNEYS:

Earl E. DeBrine, Jr.
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
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Bank of America Centre, Suite 1000
Albuquerque, NM 87103-2168
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W. Thomas Kellahin
KELLAHIN & KELLAHIN
706 Gonzales Road
Santa Fe, NM 87501-8744
Telephone: 505.982.4285

STATEMENT OF THE CASE

Reliant seeks an order from the Division cancelling two permits to drill ("APD") issued to
OXY USA Inc. for the Unit 2031 Well #021 (API # 30-021-20425) and Unit 2031 Well #111 (API
30-021-20426). Alternatively, Reliant requests an order pooling all mineral interests in the
carbon dioxide formation underlying the all of Sections 2 and 11, T18N, R31E, NMPM,

Harding County, New Mexico, forming two standard 640-acre gas spacing and proration units for the Bravo Dome Carbon Dioxide Gas Pool for each of these wells. Also to be considered will be the costs of drilling and completing said well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of OXY USA inc. as the operator of the two wells but with no charge for the risk involved in these wells.

PROPOSED EVIDENCE

WITNESSES	EST. TIME	NO. OF EXHIBITS
Scott Vanderburg (Land)	20 Minutes	5

Mr. Vanderburg will provide information concerning the location of the wells and Reliant's efforts to obtain a voluntary pooling of its acreage with OXY.

PROCEDURAL MATTERS

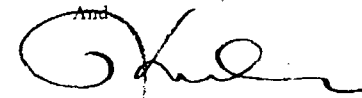
None anticipated.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: Earl E. DeBrine, Jr.
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And



KELLAHIN & KELLAHIN
W. Thomas Kellahin
706 Gonzales Road
Santa Fe, New Mexico 87501-8744
Telephone: 505.982.4285

Attorneys for Applicant

CERTIFICATE OF SERVICE

I certify that a copy of this pleading was transmitted by email to counsel of record,
this 10th day of December 2009 as follows:

William F, Esq.

Attorney for OXY

At: wcarr@hollandhart.com

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', written over a horizontal line.

W. Thomas Kellahin