

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

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

CASE NO. 20548

**OXY'S PRE-HEARING STATEMENT**

OXY USA Inc. ("OXY") (OGRID No. 16696), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

OXY USA Inc.

**ATTORNEY**

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Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
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**APPLICANT'S STATEMENT OF CASE**

OXY seeks order pooling all uncommitted interests in the Bone Spring formation (Pierce Crossing; Bone Spring East Pool (96473)) underlying a standard 560-acre, more or less, horizontal well spacing unit comprised of the S/2 N/2 and the N/2 S/2 of Section 15, and the SE/4 NW/4, the S/2 NE/4, the NE/4 SW/4, and the N/2 SE/4 of Section 16, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. This spacing unit will be dedicated to the following proposed initial wells:

- The **Refried Beans CC “15-16” State Com No. 12H Well**, which will be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 15 to a bottom-hole location in the SE/4 NW/4 (Unit F) of Section 16.
- The **Refried Beans CC “15-16” State Com No. 13H Well**, which will be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 15 to a bottom-hole location in the NE/4 SW/4 (Unit K) of Section 16.

The completed interval for the **Refried Beans CC “15-16” State Com No. 13H Well** will remain within 330 feet of the S/2 N/2 of Section 15, and the SE/4 NW/4 and the S/2 NE/4 of Section 16 to allow inclusion of these proximity tracts in a standard 560-acre horizontal well spacing comprised of S/2 N/2 and the N/2 S/2 of Section 15, and the SE/4 NW/4, the S/2 NE/4, the NE/4 SW/4, and the N/2 SE/4 of Section 16.

**APPLICANT’S PROPOSED EVIDENCE**

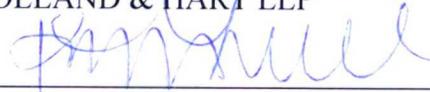
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Jeremy Murphrey, Landman	Approx. 10	Approx. 6
Tony Troutman, Geologist	Approx. 15	Approx. 4

**PROCEDURAL MATTERS**

If uncontested, OXY will present these cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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**ATTORNEYS FOR OXY USA INC.**