

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF BOLD ENERGY, LP FOR
APPROVAL OF AN APPLICATION FOR
PERMIT TO DRILL AND TO ALLOW TWO
OPERATORS IN A WELL UNIT, EDDY
COUNTY, NEW MEXICO.**

Case No. 13,877

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

BP Energy, LP
Suite 500
415 West Wall Street
Midland, Texas 79701

Attention: Peggy Kerr

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

OXY USA WTP Limited Partnership

OPPONENT'S ATTORNEY

William F. Carr

STATEMENT OF THE CASE

APPLICANT

Applicant seeks approval of an application for permit to drill its OXY Checker State Well No. 2 in the W½ of Section 8, Township 19 South, Range 29 East, NMPM. The W½ of Section 8 will be simultaneously dedicated to the proposed well, located in the SW¼NW¼ of Section 8, to be operated by applicant, and to the existing OXY Checker State Well No. 1, located in the NW¼SW¼ of Section 8, operated by OXY USA WTP Limited Partnership.

OPPONENT

PROPOSED EVIDENCE**APPLICANT****WITNESSES**

Peggy Kerr
(landman)

EST. TIME

15 min.

EXHIBITS

Approx. 5

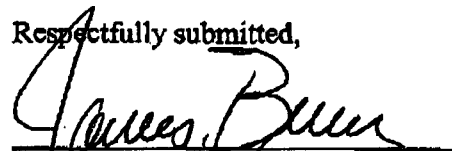
(geologist)

10 min.

Approx. 3

OPPONENT**WITNESSES****EST. TIME****EXHIBITS****PROCEDURAL MATTERS**

Respectfully submitted,



James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

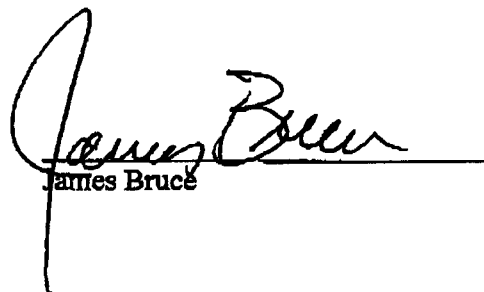
(505) 982-2043

Attorney for Bold Energy, LP

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 22nd day of February, 2007 by facsimile transmission:

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James Bruce