

**KELLAHIN AND KELLAHIN**

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EL PATIO BUILDING

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W. THOMAS KELLAHIN\*

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION  
RECOGNIZED SPECIALIST IN THE AREA OF  
NATURAL RESOURCES-OIL AND GAS LAW

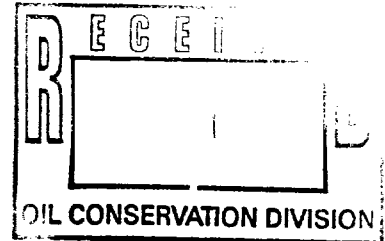
JASON KELLAHIN (RETIRED 1991)

TELEPHONE (505) 982-4285  
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July 31, 1996

**HAND DELIVERED**

Michael E. Stogner  
Chief Hearing Examiner  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, New Mexico 87505



Re: *NMOCD Case 11588*

*Application of InterCoast Oil and Gas Company  
for compulsory Pooling Lea County, New Mexico.*

A handwritten signature in dark ink, appearing to be "MS" or similar initials, written in a cursive style.

Dear Mr. Stogner:

On behalf of OXY USA INC., an adversely affecting interest owner,  
please find enclosed our Motion to Dismiss OXY USA INC. as a party  
subject to this compulsory pooling application.

Very truly yours,

A handwritten signature in dark ink, appearing to be "W. Thomas Kellahin", written in a cursive style.

W. Thomas Kellahin

cc: *via facsimile to: William F. Carr, Esq.*  
*Attorney for applicant*  
cc: *OXY USA INC.*  
*Attn: T. Kent Woolley*  
*Attn: Richard C. Foppiano*

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

**IN THE MATTER OF THE APPLICATION OF  
INTERCOAST OIL AND GAS COMPANY  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

CASE NO. 11588

**ENTRY OF APPEARANCE  
AND MOTION TO DISMISS**

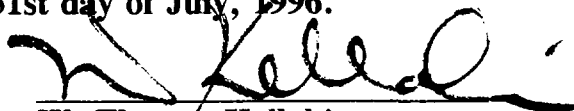
**Comes now OXY USA INC., by its attorneys, Kellahin and Kellahin, and enters its appearance in this case as an interested party in the case and moves that it be dismissed as a party to be subject to this compulsory pooling application and any resulting order issued by the Division upon the grounds that OXY USA INC and entered into a voluntary agreement with the applicant concerning OXY USA INC.'s interest in this spacing unit.**



**W. Thomas Kellahin  
Kellahin & Kellahin  
P. O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285**

**CERTIFICATE OF SERVICE**

**I certify that a copy of this pleading was transmitted by facsimile to counsel for applicant this 31st day of July, 1996.**



**W. Thomas Kellahin**