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

**APPLICATION OF OXY USA Inc.  
FOR SALT WATER DISPOSAL  
EDDY COUNTY, NEW MEXICO**

**CASE 12265**

**PRE-HEARING STATEMENT**

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

**APPEARANCE OF PARTIES**

**APPLICANT**

**ATTORNEY**

OXY USA Inc.  
5 E Greenway Plaza  
Houston, Texas 77046  
attn: Rick Foppiano

W. Thomas Kellahin  
KELLAHIN & KELLAHIN  
Santa Fe, NM 87504  
(505) 982-4285

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**STATEMENT OF THE CASE**

OXY USA Inc. ("OXY") seeks approval to convert its Government Well No 9 in Unit A of Section 10, T20S, R28E to a salt water disposal well for injection into the Bone Springs formation of the Old Millman Ranch-Bone Spring Associated Pool.

Within the 1/2 mile area of review there are two Morrow gas wells both operated by OXY which do not have cement across the injection interval. OXY proposes to monitor these wells and requests approval not to perform remedial cement operations on these wells until such time as water breaks into either of these wellbores or is detected in nearby Bone Springs producers also operated by OXY.

**PROPOSED EVIDENCE**

APPLICANT

**WITNESSES**

**EST. TIME EXHIBITS**

Richard C. Foppiano  
(petroleum engineer)

30 min. @ 8 exhibits

**PROCEDURAL MATTERS**

None

KELLAHIN AND KELLAHIN

By:   
W. Thomas Kellahin