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

APPLICATION OF OXY USA WTP Limited Partnership FOR COMPULSORY POOLING EDDY COUNTY, NEW MEXICO

**CASE 12631** 

# PRE-HEARING STATEMENT

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

### APPEARANCE OF PARTIES

**APPLICANT** 

**ATTORNEY** 

OXY USA WTP Limited Partnership 580 Westlake Park Blvd. Houston, Texas 77210 attn: Rick Foppiano 281-552-1303

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#### STATEMENT OF THE CASE

OXY USA WTP Limited Partnership ("OXY") seeks the issuance of a compulsory pooling order for certain mineral interests from the surface to the base of the Morrow formation underlying the W/2 Section 15, T20S, R25E, Eddy County, New Mexico.

The well is the Limousine Federal Com Well No. 1 to be drilled at a standard well location in Unit E of Section 15.

Despite its efforts, OXY has not be able to obtain the voluntary agreement of various unleased mineral owners within the spacing unit consisting of the W/2 of Section 15.

OXY requests the issuance of a compulsory pooling order.

#### PROPOSED EVIDENCE

### **APPLICANT**

WITNESSES

EST. TIME EXHIBITS

Doug Hurlbut

(landman)

15-20 minutes

@ 5

Gary Womack

(petroleum engineer) 15 minutes

@4

#### PROCEDURAL MATTERS

None

KELLAHIN

Thomas Kellahin