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November 12, 1993

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Florene Davidson
Oil Conservation Division
310 Old Santa Fe Trail
Santa Fe, New Mexico 87503

Re: Case Nos. 10,866 and 10,867

Dear Florene:

On behalf of our client OXY USA Inc., I am enclosing the original and two copies of a Pre-Hearing Statement for filing in the above-referenced cases. Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD
& HENSLEY


Fran Sowers, Secretary
to James Bruce

Enclosures

VIA HAND DELIVERY

FRS5\93L29.d

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:

121

APPLICATION OF OXY USA INC. FOR
EXPANSION OF THE WATERFLOOD PROJECT
IN THE EAST EUMONT UNIT, LEA COUNTY,
NEW MEXICO.

CASE NO. 10,866

APPLICATION OF OXY USA INC. FOR
ENHANCED OIL RECOVERY PROJECT
QUALIFICATION FOR THE RECOVERED OIL
TAX RATE FOR THE EAST EUMONT UNIT,
LEA COUNTY, NEW MEXICO.

CASE NO. 10,867

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

OXY USA Inc.
Post Office Box 50250
Midland, Texas 79710
(915) 685-5600

Attention: Richard E. Foppiani

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

OPPOSITION OR OTHER PARTY

ATTORNEY

STATEMENT OF CASE

APPLICANT

The East Eumont Unit was approved by Division Order No. R-2894, and the waterflood for the unit was approved by Division Order No. R-2901. The north segment of the unit has not been subject to waterflood. Applicant seeks to expand injection authorization to include the north segment of the unit, and approval of the recovered oil tax rate therefor.

OPPOSITION

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Scott E. Gengler (Engineer)	30 minutes	(a) C-108. (b) Prior Division orders. (c) Land plats. (d) Notice material.
Richard E. Foppiani	Potential witness	

Pre-Hearing Statement
NMOCD Case Nos. 10,866
and 10,867
Page 3

OPPOSITION

WITNESSES

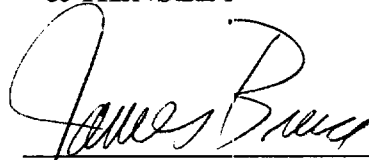
EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY

A handwritten signature in cursive script, appearing to read "James Bruce", is written over a horizontal line.

James Bruce
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Attorneys for OXY USA Inc.