

KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

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
TELEFAX (505) 982-2047

October 6, 1993

6 100

Mr. William J. LeMay
Chairman
Oil Conservation Commission
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

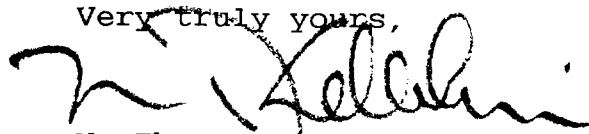
HAND DELIVERED

Re: REQUEST FOR HEARING DENOVO
NMOCDCASE 10771, Order No. R-9955
Application of OXY USA Inc. to Qualify
a Portion of its Skelly Penrose "B" Unit
Waterflood Project for the Recovered Oil
Tax Rate Pursuant to the "New Mexico Enhanced Oil
Recovery Act, Lea County, New Mexico

Dear Mr. LeMay:

On behalf of Oxy USA Inc., please find enclosed our
request for a Hearing DeNovo of the referenced case
before the New Mexico Oil Conservation Commission.

Very truly yours,



W. Thomas Kellahin

cc: Via Facsimile:
Richard C. Foppiano
Oxy USA Inc. (Midland)

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:

CASE NO. 10771
Order No. R-9955

APPLICATION OF OXY USA INC. TO AUTHORIZE
THE EXPANSION OF A PORTION OF ITS SKELLY
PENROSE "B" UNIT WATERFLOOD PROJECT AND
QUALIFY SAID EXPANSION FOR THE RECOVERED
OIL TAX RATE PURSUANT TO THE "NEW MEXICO
ENHANCED OIL RECOVERY ACT." LEA COUNTY,
NEW MEXICO

OXY USA INC.'S
REQUEST FOR A DE NOVO HEARING
BEFORE THE
NEW MEXICO OIL CONSERVATION COMMISSION

Comes now OXY USA INC., a party of record before the New Mexico Oil Conservation Division in Case 10771 and adversely affected by Division Order R-9955 entered September 7, 1993, by its attorneys Kellahin & Kellahin and pursuant to Section 70-2-13 NMSA-1978, hereby requests that the New Mexico Oil Conservation Commission hold a HEARING DENOVO in this matter.

Respectfully Submitted:



W. Thomas Kellahin
Kellahin & Kellahin
P. O. Box 2265
Santa Fe, New Mexico 87501
(505) 982-4285