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

APPLICATION OF OXY USA INC. FOR A CLOSED LOOP GAS CAPTURE INJECTION PILOT PROJECT, LEA COUNTY, NEW MEXICO.

CASE NO. 22087

OXY'S PRE-HEARING STATEMENT

OXY USA Inc. ("Oxy") (OGRID No. 16696) submits this Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

OXY USA Inc. Michael H. Feldewert

Adam G. Rankin Kaitlyn A. Luck Holland & Hart LLP Post Office Box 2208

Santa Fe, New Mexico 87504

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OTHER PARTIES

None

APPLICANT'S STATEMENT OF THE CASE

Oxy seeks an order authorizing it to engage in a closed loop gas capture injection pilot project ("pilot project") in the Bone Spring formation Mesa Verde Bone Spring Pool (96229) within a 640-acre project area consisting of the E/2 of Sections 8 and 17, all within Township 24 South, Range 32 East, NMPM, Lea County, New Mexico, by occasionally injecting into the

following wells, each of which are located in the Bone Spring formation in Lea County, New Mexico:

- The Mesa Verde BS Unit 1H well (API No. 30-025-44101), with a surface location 271 feet FSL and 245 feet FEL (Unit P) in Section 17, and a bottom hole location 335 feet FNL and 992 feet FEL (Unit A) in Section 8;
- The Mesa Verde BS Unit 2H well (API No. 30-025-44196), with a surface location 240 feet FSL and 1,614 feet FEL (Unit O) in Section 17, and a bottom hole location 171 feet FNL and 1,275 feet FEL (Unit A) in Section 8;
- Mesa Verde BS Unit 3H well (API No. 30-025-44183), with a surface location 240 feet FSL and 1,644 feet FEL (Unit O) in Section 17, and a bottom hole location 197 feet FNL and 2,368 feet FEL (Unit B) in Section 8;
- Mesa Verde BS Unit 4H well (API No. 30-025-44064), with a surface location 280 feet FSL and 965 feet FEL (Unit P) in Section 17, and a bottom hole location 185 feet FNL and 512 feet FEL (Unit A) in Section 8;
- Mesa Verde BS Unit 5H well (API No. 30-025-44185), with a surface location 280 feet FSL and 995 feet FEL (Unit P) in Section 17, and a bottom hole location 196 feet FNL and 1,329 feet FEL (Unit B) in Section 8; and
- Mesa Verde BS Unit 6H well (API No. 30-025-44042), with a surface location 280 feet FSL and 2,624 feet FEL (Unit O) in Section 17, and a bottom hole location 206 feet FNL and 2,292 feet FEL (Unit B) in Section 8.

Oxy seeks authority to utilize these producing wells to occasionally inject produced gas into the Bone Spring formation at total vertical depths between approximately 9,240 feet to 11,860 feet along the horizontal portion of each wellbore at surface injection pressures of no more than 1,200 psi. The source of the produced gas will be the Bone Spring and Wolfcamp formations. The subject acreage is located approximately 30 miles west, northwest of Jal, New Mexico.

APPLICANT'S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|---------------------------------|----------------------------------|-----------|
| Stephen Janacek, Engineer | Affidavit and Live (~30 minutes) | Approx. 5 |
| Michelle Wiechman, Geologist | Affidavit and Live (~15 minutes) | Approx. 2 |
| Xueying Xie, Reservoir Engineer | Affidavit and Live (~30 minutes) | Approx. 2 |

PROCEDURAL MATTERS

Oxy intends to present this case by affidavit and through the presence of live witnesses at the hearing and intends to pre-file its affidavits and additional exhibits on August 3, 2021.

Respectfully submitted,

HOLLAND & HART LLP

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State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 38848

QUESTIONS

| Operator: | OGRID: |
|-----------------------|--|
| OXY USA INC | 16696 |
| P.O. Box 4294 | Action Number: |
| Houston, TX 772104294 | 38848 |
| | Action Type: |
| | [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

| Testimony | | |
|---|---------------|--|
| Please assist us by provide the following information about your testimony. | | |
| Number of witness | Not answered. | |
| Testimony time (in minutes) | Not answered. | |