

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

**APPLICATIONS OF OXY USA INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 22761-22765

OXY'S CONSOLIDATED PRE-HEARING STATEMENT

OXY USA Inc. ("Oxy") (OGRID No. 16696) submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

OXY USA Inc.

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
TEL: (505) 988-4421
FAX: (505) 983-6043

APPLICANT'S STATEMENT OF CASE

In **Case No. 22761**, OXY seeks an order pooling all uncommitted interests in the Bone Spring formation [Red Tank; Bone Spring, East (Pool Code 51687)] underlying a standard 611.84 acre, more or less, horizontal well spacing unit comprised of the W/2 of Sections 7 and 18, Township 22 South, Range 33 East (NMPM), Lea County New Mexico. OXY seeks to initially dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- **Senile Felines 18-7 State Com 22H** well to be drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 18 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 7; and
- **Senile Felines 18-7 State Com 21H** and **Senile Felines 18-7 State Com 31H** wells to be drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 18 to a bottom hole location in the NW/4 NW/4 (Lot 1) of Section 7.

The completed interval of the Senile Felines 18-7 State Com 22H well is expected to remain within 330 feet of the offsetting quarter-quarter sections or equivalent tracts to include them in a standard horizontal well spacing unit.

In **Case No. 22762**, OXY seeks an order pooling all uncommitted interests in the Bone Spring formation [Red Tank; Bone Spring, East (Pool Code 51687)] underlying a standard 640 acre, more or less, horizontal well spacing unit comprised of the E/2 W/2 and W/2 E/2 of Sections 7 and 18, Township 22 South, Range 33 East (NMPM), Lea County New Mexico. OXY seeks to initially dedicate the above-referenced horizontal spacing unit to the proposed **Senile Felines 18-7 State Com 24H** and **Senile Felines 18-7 State Com 312H** wells to be drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 18 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 7. The completed intervals of both proposed wells are expected to remain within 330 feet of the offsetting quarter-quarter sections or equivalent tracts to include them in a standard horizontal well spacing unit.

In **Case No. 22763**, OXY seeks an order pooling all uncommitted interests in the Bone Spring formation [Red Tank; Bone Spring, East (Pool Code 51687)] underlying a standard 640-acre, more or less, horizontal well spacing unit comprised of the E/2 of Sections 7 and 18,

Township 22 South, Range 33 East (NMPM), Lea County New Mexico. OXY seeks to initially dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- **Senile Felines 18-7 State Com 25H** well to be drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 18 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 7; and
- **Senile Felines 18-7 State Com 26H** and **Senile Felines 18-7 State Com 313H** wells to be drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 18 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 7.

The completed interval of the Senile Felines 18-7 State Com 25H well is expected to remain within 330 feet of the offsetting quarter-quarter sections or equivalent tracts to include them in a standard horizontal well spacing unit.

In **Case No. 22764**, OXY seeks an order pooling all uncommitted interests in the Wolfcamp formation [WC-025 G-09 S223332A; UPR Wolfcamp (Pool Code 98177)] underlying a standard 640-acre, more or less, horizontal well spacing unit comprised of the E/2 of Sections 7 and 18, Township 22 South, Range 33 East (NMPM), Lea County New Mexico. OXY seeks to initially dedicate the above-referenced horizontal spacing unit to the proposed **Senile Felines 18-7 State Com 34H** well to be drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 18 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 7. The completed interval of the Senile Felines 18-7 State Com 34H well is expected to remain within 330 feet of the offsetting quarter-quarter sections or equivalent tracts to include them in a standard horizontal well spacing unit.

In **Case No. 22765**, OXY seeks an order pooling all uncommitted interests in the Wolfcamp formation [WC-025 G-09 S223332A; UPR Wolfcamp (Pool Code 98177)] underlying

a standard 611.84-acre, more or less, horizontal well spacing unit comprised of the W/2 of Sections 7 and 18, Township 22 South, Range 33 East (NMPM), Lea County New Mexico. OXY seeks to initially dedicate the above-referenced horizontal spacing unit to the proposed **Senile Felines 18-7 State Com 311H** well to be drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 18 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 7. The completed interval of the Senile Felines 18-7 State Com 311H well is expected to remain within 330 feet of the offsetting quarter-quarter sections or equivalent tracts to include them in a standard horizontal well spacing unit.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Amber Delach, Land Negotiator	Affidavit	Approx. 5
Daniel Burnett, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

OXY requests that these cases be consolidated for purposes of hearing. OXY anticipates presenting these consolidated cases by affidavit, if unopposed.

Respectfully submitted,

HOLLAND & HART LLP

By: _____

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
P.O. Box 2208
Santa Fe, NM 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com

ATTORNEYS FOR OXY USA INC.

18763027_v1

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 102593

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 102593
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>