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

ATTORNEY

pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

OXY USA Inc.

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 agrankin@hollandhart.com

ATTORNEYS FOR OXY USA INC.

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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

Page 6 of 6

Action 102594

QUESTIONS

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	102594
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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