

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

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

**CASE NO. 23204**

**OXY'S PRE-HEARING STATEMENT**

OXY USA Inc. ("Applicant" or "OXY"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

OXY USA Inc.  
("OXY")

**ATTORNEY**

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**APPLICANT'S STATEMENT OF THE CASE**

In this case, OXY seeks an order pooling all uncommitted interests in the Wolfcamp (oil) formation (WC-025 G-08 S223227D; Upper Wolfcamp [Pool code 98286]) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 25 and 36, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico. OXY seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- the **Stack Cats 25 36 Fed Com #31H** and **Stack Cats 25 36 Fed Com #311H**, to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 24, to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 36; and
- the **Stack Cats 25 36 Fed Com #32H** and **Stack Cats 25 36 Fed Com #33H** to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 24, to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 36.

The completed interval of the **Stack Cats 25 36 Fed Com #311H** is expected to remain within 330 feet of the adjoining quarter-quarter section (or equivalent) tracts to allow inclusion of these proximity tracts within the proposed horizontal spacing unit under 19.15.16.15.B(1)(b) NMAC.

The completed interval for the **Stack Cats 25 36 Fed Com #31H**, **#32H**, and **#311H** wells will comply with statewide setbacks for oil wells. The **Stack Cats 25 36 Fed Com #33H** will be at a non-standard location; therefore, OXY will apply separately by administrative application. OXY has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject acreage.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Amber Delach, Landman	Self-Affirmed Statement	Approx. 5
Daniel Burnett, Geologist	Self-Affirmed Statement	Approx. 5

**PROCEDURAL MATTERS**

OXY intends to present this case by self-affirmed statement at hearing if unopposed.

Respectfully submitted,

HOLLAND & HART LLP

By:  \_\_\_\_\_

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

Action 161308

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 161308
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>