

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

**APPLICATION OF OXY USA INC. FOR
AN ORDER ACKNOWLEDGING THE DR
PI (DEEP) FED UNIT, LEA COUNTY,
NEW MEXICO.**

CASE NO. 22637

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

OXY USA Inc.

ATTORNEY

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

APPLICANT’S STATEMENT OF CASES

Oxy seeks an order acknowledging the Dr Pi (Deep) Fed Unit (“Dr Pi Unit”). The Dr Pi Unit will consist of approximately 2,595.40 acres of the following federal land situated in Lea County, New Mexico:

Township 22 South, Range 32 East, N.M.P.M.

Section 7: All
Section 8: All
Section 17: All
Section 18: All

The unitized interval is all formations below the base of the Delaware Formation, which is found at 8,647 feet measured depth in the Federal 8 Com (30-025-32709) well, located in Section 8, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico. OXY is the designated operator under the Unit Agreement, which contains 100% federal lands. OXY is the sole record title owner and sole working interest owner in the Unit and, therefore, controls a sufficient percentage of the interest to provide effective control of unit operations. OXY has met with the Bureau of Land Management and received a letter approving the unit area as logically subject to exploration and development under the unitization provisions of the Mineral Leasing Act. The Unit Agreement, and the unitized operation and management of the Unit Area, are in the best interests of conservation, the prevention of waste and the protection of correlative rights

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Amber Delach, Landman	Affidavit	Approx. 2
Daniel Burnett, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

OXY intends to present this case by affidavit, if unopposed.

Respectfully submitted,

HOLLAND & HART LLP



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

ATTORNEYS FOR OXY USA INC.

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 95001

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 95001
	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>