

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

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

CASE NOS. 20786 & 20813

OXY'S CONSOLIDATED PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

OXY USA Inc.

ATTORNEY

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APPLICANT'S STATEMENT OF CASES

In **Case No. 20786**, OXY seeks an order pooling all uncommitted interests in the Bone Spring formation (Pierce Crossing; Bone Spring, East (96473)) underlying a standard 640-acre, more or less, horizontal well spacing unit comprised of the W/2 of Sections 4 and 9, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. OXY seeks to dedicate this spacing unit to the following proposed initial wells:

- The **Heads CC 9-4 Fed Com #21H Well**, and the **Heads CC 9-4 Fed Com #22H Well**, both of which will be horizontally drilled from a common surface

location in the NW/4 SW/4 (Unit L) of Section 9 to bottom-hole locations in the NW/4 NW/4 (Lot 4) of Section 4.

- The **Heads CC 9-4 Fed Com #23H Well** to be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 9 to a bottom-hole location in the NE/4 NW/4 (Lot 3) of Section 4.

The completed interval for the **Heads CC 9-4 Fed Com #22H Well** will remain within 330 feet of the E/2 W/2 of Sections 4 and 9 to allow inclusion of these proximity tracts in a standard 640-acre horizontal well spacing comprised of W/2 of Sections 4 and 9.

In **Case No. 20813**, OXY seeks an order pooling all uncommitted interests in the Bone Spring formation (Pierce Crossing; Bone Spring, East (96473)) underlying a standard 640-acre, more or less, horizontal well spacing unit comprised of the E/2 of Sections 4 and 9, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. OXY seeks to dedicate this spacing unit to the following proposed initial wells:

- The **Heads CC 9-4 Fed Com #24H Well** and the **Heads CC 9-4 Fed Com #25H Well**, both of which will be horizontally drilled from a common surface location in the SW/4 SE/4 (Unit O) of Section 9 to bottom-hole locations in the NW/4 NE/4 (Lot 2) of Section 4.
- The **Heads CC 9-4 Fed Com #26H Well** to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 9 to a bottom-hole location in the NE/4 NE/4 (Lot 1) of Section 4.

The completed interval for the **Heads CC 9-4 Fed Com #25H Well** will be within 330 feet of the E/2 E/2 of Sections 4 and 9 to allow inclusion of these proximity tracts in a standard 640-acre horizontal well spacing comprised of E/2 of Sections 4 and 9.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Peter Van Liew, Landman	By Affidavit	Approx. 6
Tyler Evans, Geologist	By Affidavit	Approx. 4

PROCEDURAL MATTERS

OXY requests that **Case Nos. 20786** and **20813** be consolidated for hearing purposes. If uncontested, OXY will present these cases by affidavits.

Respectfully submitted,

HOLLAND & HART LLP



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