

**Jones, William V., EMNRD**

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**From:** Ezeanyim, Richard, EMNRD  
**Sent:** Monday, December 14, 2009 9:53 AM  
**To:** Jones, William V., EMNRD  
**Subject:** FW: Case 14412  
**Attachments:** Reliant-PHS-Case 14412.PDF

Will:

FYI

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**From:** Davidson, Florene, EMNRD  
**Sent:** Monday, December 14, 2009 9:07 AM  
**To:** Ezeanyim, Richard, EMNRD  
**Subject:** FW: Case 14412

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**From:** Thomas Kellahin [mailto:tkellahin@comcast.net]  
**Sent:** Thursday, December 10, 2009 3:39 PM  
**To:** Davidson, Florene, EMNRD  
**Cc:** Earl E. DeBrine; BILL CARR  
**Subject:** Case 14412

*WVJ 12-14/09*

Dear Florene,

Please find attached for filing our pre-hearing statement on behalf of Reliant Exploration and Production, L.L.C. for Case 14412 currently set for hearing on the December 17th OCD docket.

Thanks,

**Tom Kellahin**

Kellahin & Kellahin  
Attorneys at Law  
706 Gonzales Road  
Santa Fe, NM 87501  
ph 505.982.4285  
Fax 505.982.2047  
Email [tkellahin@comcast.net](mailto:tkellahin@comcast.net)

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

IN THE MATTER OF THE APPLICATION OF RELIANT  
EXPLORATION AND PRODUCTION LLC,  
FOR CANCELLATION OF TWO PERMITS TO DRILL  
("APD") ISSUED TO OXY USA, INC. AND FOR  
COMPULSORY POOLING IN HARDING COUNTY,  
NEW MEXICO.

CASE NO. 14412

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Reliant Exploration and  
Production LLC, ("Reliant" or "Applicant") as required by the Oil Conservation  
Division Rule 19.15.14.1211(B).

APPEARANCES

APPLICANT:

Reliant Exploration and Production Company, LLC,

ATTORNEYS:

Earl E. DeBrine, Jr.  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
Post Office Box 2168  
Bank of America Centre, Suite 1000  
Albuquerque, NM 87103-2168  
Telephone: (505) 848-1800

W. Thomas Kellahin  
KELLAHIN & KELLAHIN  
706 Gonzales Road  
Santa Fe, NM 87501-8744  
Telephone: 505.982.4285

STATEMENT OF THE CASE

Reliant seeks an order from the Division cancelling two permits to drill ("APD") issued to  
OXY USA Inc. for the Unit 2031 Well #021 (API # 30-021-20425) and Unit 2031 Well #111 (API  
# 30-021-20426). Alternatively, Reliant requests an order pooling all mineral interests in the  
carbon dioxide formation underlying the all of Sections 2 and 11, T18N, R31E, NMPM,

Harding County, New Mexico, forming two standard 640-acre gas spacing and proration units for the Bravo Dome Carbon Dioxide Gas Pool for each of these wells. Also to be considered will be the costs of drilling and completing said well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of OXY USA inc. as the operator of the two wells but with no charge for the risk involved in these wells.

**PROPOSED EVIDENCE**

<b>WITNESSES</b>	<b>EST. TIME</b>	<b>NO. OF EXHIBITS</b>
Scott Vanderburg (Land)	20 Minutes	5

Mr. Vanderburg will provide information concerning the location of the wells and Reliant's efforts to obtain a voluntary pooling of its acreage with OXY.

**PROCEDURAL MATTERS**

None anticipated.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.

By: Earl E. DeBrine, Jr.  
Post Office Box 2168  
Bank of America Centre  
500 Fourth Street NW, Suite 1000  
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And



KELLAHIN & KELLAHIN  
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Santa Fe, New Mexico 87501-8744  
Telephone: 505.982.4285

*Attorneys for Applicant*

CERTIFICATE OF SERVICE

I certify that a copy of this pleading was transmitted by email to counsel of record, this 10th day of December 2009 as follows:

William F, Esq.  
Attorney for OXY  
At: [wcarr@hollandhart.com](mailto:wcarr@hollandhart.com)

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', written over a horizontal line.

W. Thomas Kellahin