

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

IN THE MATTER OF THE APPLICATION OF RELIANT
EXPLORATION AND PRODUCTION COMPANY, LLC,
TO TERMINATE THE TEMPORARY ABANDONED
STATUS OF TWO CO2 WELLBORES DRILLED BY
OXY USA, INC. AND FOR COMPULSORY POOLING,
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.
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STATEMENT OF THE CASE

Reliant seeks an order from the Division cancelling orders allowing temporary abandonment of the Unit 2031 Well #021 (API # 30-021-20425) and Unit 2031 Well #111 (API # 30-021-20426). Additionally, 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 Reliant Exploration and Production LLC as the operator of the two wells.

PROPOSED EVIDENCE

WITNESSES	EST. TIME	NO. OF EXHIBITS
Scott Vanderburg (Land)	1 hour	11

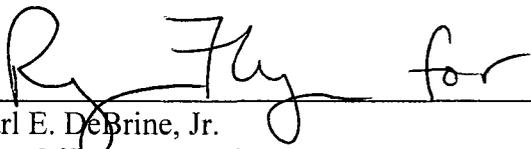
Mr. Vanderburg will provide information concerning the location of the wells and Reliant's efforts to obtain a voluntary pooling of its acreage with OXY.

PROCEDURAL MATTERS

None anticipated.

Respectfully submitted,

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

By:  for

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