

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

2005 JUL 6 PM 2 42

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:**

**CASE NO. 13520**

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

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by  
the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

OXY USA Inc.  
Attn: Mark Hodge  
Post Office Box 4294  
Houston, Texas 77210-4294  
(281) 552-1303

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988.4421

**STATEMENT OF CASE**

**APPLICANT**

Applicant in the above-styled cause seeks an order pooling all mineral interests in all formations from the surface to the top of the Precambrian Basement in the following described standard 640-acre spacing and proration unit comprised of all of Section 19, Township 19 North, Range 33 East, N.M.P.M., Harding County, New Mexico, which includes but is not necessarily limited to the Tubb formation (from the base of the Cimarron

Anhydrite to the top of the Granite), in the Bravo Dome Carbon Dioxide Gas Pool. OXY proposes to dedicate the above-referenced spacing or proration unit to its Bravo Dome Well No. 1933-191G to be drilled at a standard gas well location 1980 feet from the North line and 1718 feet from the East line (Unit G) of said Section 19, to an approximate depth of 2,600 feet to test any and all formations from the surface to the base of the Tubb formation. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of OXY USA Inc. as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 3 miles northwest of Rosebud, New Mexico.

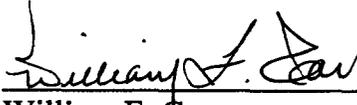
**PROPOSED EVIDENCE**

**APPLICANT**

<b>WITNESSES</b> (Name and Expertise)	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Mark Hodge (Land)	Approx. 10 Minutes	Approx. 6

**PROCEDURAL MATTERS**

OXY USA Inc. has none at this time.

  
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William F. Carr  
Attorney for OXY USA Inc.