

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

**IN THE MATTER OF THE APPLICATION
OF OXY USA WTP LIMITED PARTNERSHIP
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

2011 FEB 27 PM 49
RECEIVED O.C.D.
CASE NO. 15099

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by OXY USA WTP Limited Partnership
("OXY") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

OXY USA WTP Limited Partnership

ATTORNEY

Michael H. Feldewert
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STATEMENT OF THE CASE

OXY seeks an order (1) creating a non-standard, 160-acre spacing and proration unit comprised of the E/2W/2 of Section 17, Township 23 South, Range 28 East, NMPM, Eddy County and (2) pooling all mineral interests in the Bone Spring formation underlying this acreage. This non-standard unit will be dedicated to Oxy's proposed **Carter Farms A Fee Com 003H Well**, which will be horizontally drilled from a surface location in the NE/4NW/4 (Unit C) to a standard bottom hole location in the SE/4SW/4 (Unit N) of Section 17. The completed

interval for this well will remain within the 330-foot standard offset required by the Division's rules.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Wesley Robertson, Landman	Approx. 10 minutes	Approx. 5
Brittany Steel, Geologist	Approx. 10 minutes	Approx. 4

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP



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