

August 9, 2007

VIA HAND DELIVERY

Ms. Florene Davidson, Clerk
Oil Conservation Commission
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

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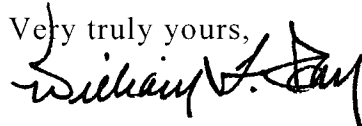
Re: Case No. 13877 (de novo): Application of Bold Energy, LP for approval of an application for permit to drill and to allow two operators on a well unit, Eddy County, New Mexico.

Case No. 13950: Application of OXY USA WTP-Limited Partnership for denial of an Application for Permit to Drill, Eddy County, New Mexico.

Dear Ms. Davidson:

Pursuant to Oil Conservation Division Rule 19.15.14.1211NMAC, OXY USA WTP, Limited Partnership files herewith its pre-hearing statements and six copies of the exhibits it will present at the August 16, 2007 Oil Conservation Commission hearing on the above-referenced applications. By copy of this letter, I am providing these pre-hearing statements and exhibits to all parties of record in this case.

Very truly yours,



William F. Carr

Enclosures

cc: James Bruce, Esq.
Attorney for Bold Energy, LP

Cheryl Bada, Esq.
Oil Conservation Commission
New Mexico Department of Energy,
Minerals and Natural Resources

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

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

CASE NO. 13950

**APPLICATION OF OXY USA WTP-LIMITED
PARTNERSHIP FOR DENIAL OF AN APPLICATION
FOR PERMIT TO DRILL, EDDY COUNTY, NEW
MEXICO.**

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

OXY USA WTP Limited Partnership
Attn: David Evans
Post Office Box 4294
Houston, TX 77210-4294
(713) 366-5303

ATTORNEY

William F. Carr, Esq.
Holland & Hart LLP
Post Office Box 2297
Santa Fe, New Mexico 87504-2208
(505) 988-4421

OPPOSITION

Bold Energy, LP

ATTORNEY

James Bruce, Esq.
Post Office Box 1056
Santa Fe, New Mexico 87504-1056
(505) 982-2043

STATEMENT OF CASE

APPLICANT

Applicant seeks denial of an application of Bold Energy, LP for a permit to drill the Checker State Well No. 2 in the SW/4 NW/4 (Unit E) of Section 8, Township 19 South, Range 29 East, NMPM. This application is filed pursuant to the provisions of Oil Conservation Division Rule 104 and Division Order No. R-12747-A entered on June 7, 2007.

OPPOSITION

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and Expertise)

ESTIMATED TIME

EXHIBITS

David Evans
Land

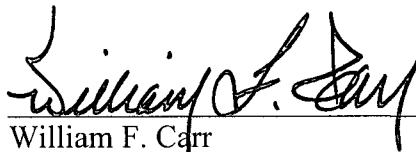
Approx. 10 Minutes

Approx. 3

Elizabeth Bush-Ivie (May Call)
Regulatory Affairs
May Call

PROCEDURAL MATTERS

1. OXY USA WTP Limited Partnership will file a Motion to Quash the Subpoena issued to Bold on August 6, 2007.
2. Oxy will request that the hearing on this application be consolidated with the hearing in Case No. 13877.



William F. Carr
Attorney for OXY USA WTP Limited Partnership

CERTIFICATE OF SERVICE

I certify that on August 9, 2007 I served a copy of the foregoing document to the following by

- ☐ U.S. Mail, postage prepaid
- ☐ Hand Delivery
- ☒ Fax
- ☐ Electronic Service by LexisNexis File & Serve

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William F. Carr