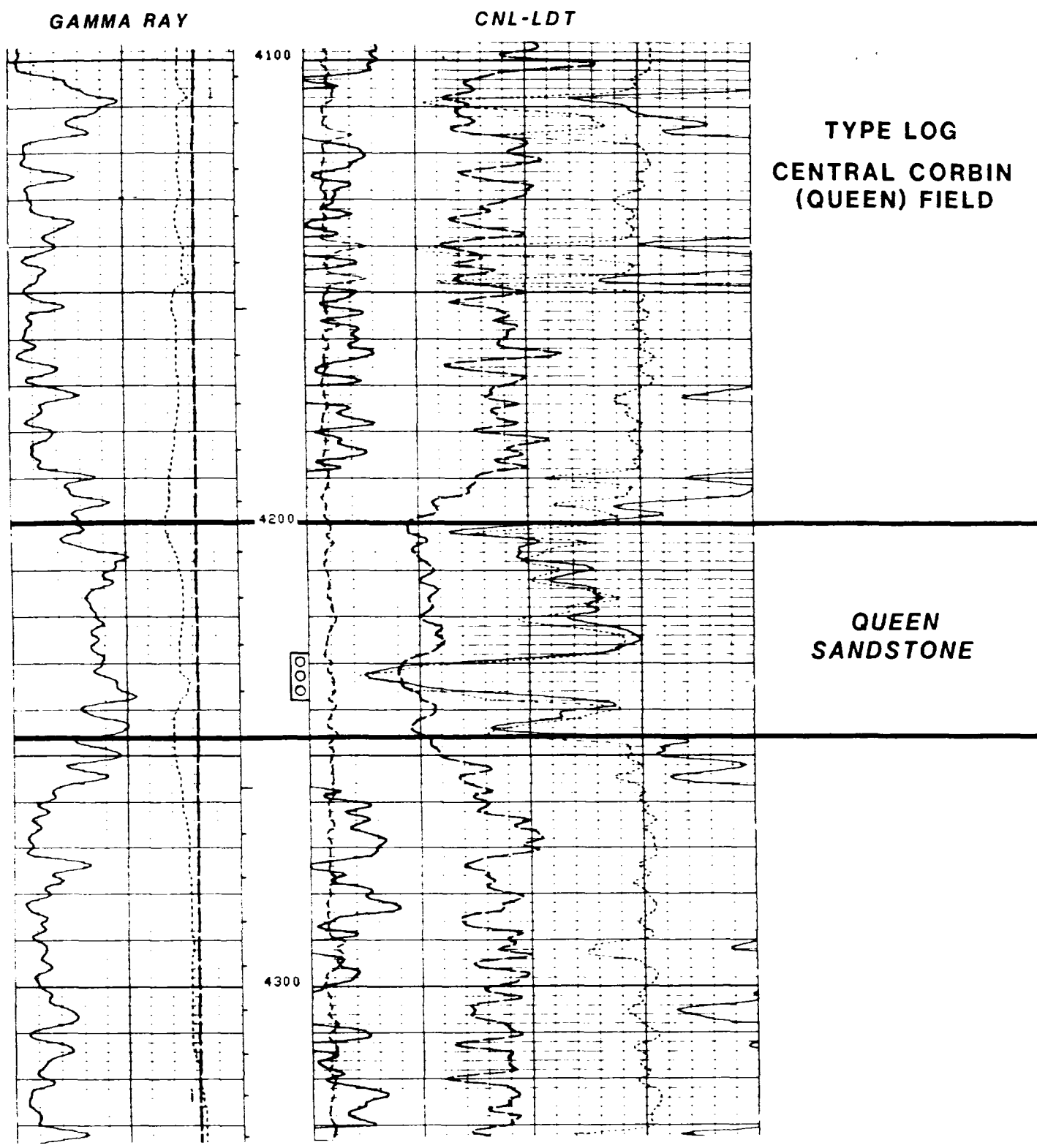


990' FNL & 1980' FEL  
Sec. 9, T-18-S, R-33-E  
Lea County, New Mexico  
KB 3985'



TYPE LOG  
CENTRAL CORBIN  
(QUEEN) FIELD

QUEEN  
SANDSTONE

PF 4228-38' IPF 482 BOPD  
EXHIBIT C

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

RECEIVED

AUG 17 1990

OIL CONSERVATION DIVISION

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

APPLICATION OF OXY USA, INC.  
FOR STATUTORY UNITIZATION,  
LEA COUNTY, NEW MEXICO

CASE NO. 10062

APPLICATION OF OXY USA, INC.  
FOR POOL CONTRACTION AND EXTENSION  
LEA COUNTY, NEW MEXICO

CASE NO. 10063

APPLICATION OF OXY USA, INC.  
FOR A WATERFLOOD PROJECT,  
LEA COUNTY, NEW MEXICO

CASE NO. 10064

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by OXY  
USA, INC. as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

OXY USA, Inc.  
P.O. Box 50250  
Midland, TX 79710  
Attn: Mr. Richard Foppiano  
(915) 685-5913

W. Thomas Kellahin  
KELLAHIN, KELLAHIN & AUBREY  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

OPPOSITION OR OTHER PARTY  
(name, address, phone  
and contact person)

ATTORNEY

Pre-hearing Statement  
NMOCD Case No. 10062, 10063 and 10064  
Page 2

**STATEMENT OF CASE**

**APPLICANT**

(please make a concise statement of what is being sought with this application and the reasons therefore.)

OXY USA, Inc. seeks the approval of a waterflood project in the Central Corbin-Queen Oil Pool and needs the assistance of statutory unitization in order to provide for the effective and efficient control of operations in order to maximize secondary oil recovery on a unit basis, including the approval of the waterflood project and the contraction and expansion of the applicable pools.

**OPPOSITION OR OTHER PARTY**

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement)

Pre-hearing Statement  
 NMOCD Case No. 10062, 10063 and 10064  
 Page 3

### PROPOSED EVIDENCE

#### APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Archie Taylor (engineer)	45 min.	Breakdown of remaining reserves
Bob Doty (geologist)	15 min.	Calculations showing unit is profitable
Charles Dickenson (landman)	20 min.	Map of proposed unit
		Map showing proposed injection wells
		Breakdown of net porosity-acre-feet
		Type log of Unitized Formation
		Data sheet
		Structure map and isopach
		Table of production rates
		Remaining C-108 items
		Cross section
		Correspondence relating to efforts to get voluntary unitization
		Table showing status of WI and RI
		Letter from BLM Unit Agreement and Unit Operating Agreement

#### OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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Pre-hearing Statement  
NMOCD Case No. 10062, 10063 and 10064  
Page 4

**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to the hearing)

**KELLAHIN, KELLAHIN & AUBREY**

By: 

W. Thomas Kellahin  
Post Office Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285