

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

**IN THE MATTER OF THE APPLICATION OF
OXY USA WTP, LLC AND CANANN RESOURCES
DRILLING COMPANY, LLC TO REOPEN AND
AMEND ORDER NO. R-20279 *NUNC PRO TUNC***

**UNDERLYING MATTER:
IN THE MATTER OF THE APPLICATION OF
CENTENNIAL RESOURCE PRODUCTION, LLC
TO REOPEN CASE NO. 16265 TO ADD
ADDITIONAL INITIAL WELLS UNDER THE
TERMS OF COMPULSORY POOLING ORDER
NO. R-20001, LEA COUNTY, NEW MEXICO**

CASE NO. 16265 (REOPENED)

PRE-HEARING STATMENT

This Pre-Hearing Statement is submitted on behalf of Centennial Resource Production, LLC (“Centennial”), and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPLICANT: OXY USA WTP, LLC

ATTORNEY: Dalva L. Moellenberg
Gallagher & Kennedy, P.A.
1239 Paseo de Peralta
Santa Fe, NM 87501
(505)-989-7278

OPPOSITION OR OTHER PARTY: CENTENNIAL RESOURCE
PRODUCTION, LLC

ATTORNEY: Ernest L. Padilla
Padilla Law Firm, P.A.
P.O. Box 2523
Santa Fe, NM 87504
(505) 988-7577

STATEMENT OF CASE

OPPOSITION:

Centennial's position in this case is stated its is Motion to Dismiss previously submitted to the Division. In summary, Centennial contends that OXY may not amend Order R-20279 through nunc pro tunc procedure, and that it, or its assignee, did not timely elect to participate in drilling of the wells under Order R-20269

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
OPPOSITION:		
WITNESSES	EST. TIME	EXHIBITS
Gavin Smith Landman	15 min.	Approximately 5
None		

PROCEDURAL MATTERS

As stated above, Centennial has filed a Motion to Dismiss in this case that may be dispositive of the issues raised by the parties. Undersigned counsel and counsel for OXY have conferred, and OXY will file a response to the Motion to Dismiss and then ask for a prehearing conference.

Respectfully submitted,

PADILLA LAW FIRM, P.A.

By: /s/ ERNEST L. PADILLA
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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing pleading to be sent via e-mail on this 19th day of June, 2019 to:

Dalva L. Moellenberg --dln@gknet.com
Attorney for Applicant

/s/ ERNEST L. PADILLA

