

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

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

**CASE NOS. 20788 & 20789**

**OXY'S CONSOLIDATED PRE-HEARING STATEMENT**

OXY USA Inc. ("OXY") (OGRID No. 16696) submits this Consolidated Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

OXY USA Inc.

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421  
(505) 983-6043 Facsimile

**APPLICANT'S STATEMENT OF CASES**

In **Case No. 20788**, OXY seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool (98220)) underlying a standard 640-acre, more or less, horizontal well spacing unit comprised of the W/2 of Sections 4 and 9, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. OXY seeks to dedicate this spacing unit to the following proposed initial wells:

- The **Heads CC 9-4 Fed Com #31H Well**, and the **Heads CC 9-4 Fed Com #32H Well**, both of which will be horizontally drilled from a common surface

location in the SW/4 SW/4 (Unit M) of Section 9 to bottom-hole locations in the NW/4 NW/4 (Lot 4) of Section 4.

- The **Heads CC 9-4 Fed Com #33H Well** to be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 9 to a bottom-hole location in the NE/4 NW/4 (Lot 3) of Section 4.

In **Case No. 20789**, OXY seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool (98220)) underlying a standard 640-acre, more or less, horizontal well spacing unit comprised of the E/2 of Sections 4 and 9, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. OXY seeks to dedicate this spacing unit to the following proposed initial wells:

- The **Heads CC 9-4 Fed Com #34H Well** and the **Heads CC 9-4 Fed Com #35H Well**, both of which will be horizontally drilled from a common surface location in the SW/4 SE/4 (Unit O) of Section 9 to bottom-hole locations in the NW/4 NE/4 (Lot 2) of Section 4.
- The **Heads CC 9-4 Fed Com #36H Well** to be horizontally drilled from a common surface location in the NW/4 NE/4 (Unit B) of Section 16 to a bottom-hole location in the NE/4 NE/4 (Lot 1) of Section 4.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Peter Van Liew, Landman	By Affidavit	Approx. 6
Tyler Evans, Geologist	By Affidavit	Approx. 4

**PROCEDURAL MATTERS**

OXY requests that **Case Nos. 20788** and **20789** be consolidated for hearing purposes. If uncontested, OXY will present these cases by affidavits.

Respectfully submitted,

HOLLAND & HART LLP



---

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
kaluck@hollandhart.com

**ATTORNEYS FOR OXY USA INC.**