

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

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

211 1512  
1512  
CASE NO 15701

**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  
Jordan L Kessler  
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**STATEMENT OF THE CASE**

OXY seeks an order (1) creating a 320 acre non-standard spacing and proration unit comprised of the N/2 N/2 of Section 9, and the N/2 N/2 of Section 10, Township 19 South, Range 29 East, NMPM Eddy County, New Mexico, and (2) pooling all uncommitted interests in the Bone Spring formation underlying this acreage OXY proposes to dedicate the above-referenced spacing and proration unit as the project area for its proposed **Turkey Track 9-10 State No 21H Well**, which will be horizontally drilled from a surface location in the SE/4 NE/4

(Unit H) of Section 8 to a standard bottom hole location in NE/4 NE/4 (Unit A) of Section 10  
The completed interval for this well will remain within the 330-foot standard offset required by  
the Statewide Rules set forth in 19 15 15 NMAC

**APPLICANT'S PROPOSED EVIDENCE**

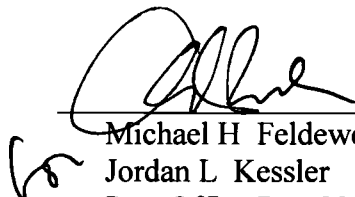
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
India Isbell Landman	Approx 10 minutes	Approx 7
Tasos Boulis, Reservoir Engineer	Approx 10 minutes	Approx 5

**PROCEDURAL MATTERS**

None at this time

Respectfully submitted

HOLLAND & HART LLP

  
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**ATTORNEYS FOR OXY USA INC**