

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.

RECEIVED OCD
2011 AUG 24 P 1:06
CASE NO. 15780

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

CASE NO. 15781

OXY'S CONSOLIDATED PRE-HEARING STATEMENT

This consolidated 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
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421

OTHER PARTIES

Snow Oil & Gas Inc. and the Estate of Nona
Snow, deceased

J. Scott Hall
Montgomery & Andrews, P.A.
Post Office Box 237
Santa Fe, New Mexico 87504-2307
(505) 982-3873

STATEMENT OF THE CASE

Under these consolidated applications, OXY seeks orders creating two non-standard spacing and proration units and pooling all uncommitted interests in the Bone Spring formation underlying these units for the following acreage and proposed wells in Township 19 South, Range 29 East, NMPM, Eddy County, New Mexico:

- (1) a 320-acre non-standard spacing and proration unit comprised of the N/2 S/2 of Section 9 and the N/2 S/2 of Section 10, to be dedicated to its proposed **Turkey Track 9-10 State No. 23H Well**, which will be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 8 to a standard bottom hole location in NE/4 SE/4 (Unit I) of Section 10; and
- (2) a 320-acre non-standard spacing and proration unit comprised of the S/2 S/2 of Section 9 and the S/2 S/2 of Section 10, to be dedicated to its proposed **Turkey Track 9-10 State No. 24H Well**, which will be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 8 to a standard bottom hole location in SE/4 SE/4 (Unit P) of Section 10.

The completed interval for each of these proposed wells will remain within the 330-foot standard offset required by the Statewide Rules set forth in 19.15.15 NMAC.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
India Isbell, Landman	Approx. 15 minutes	Approx. 7
Chet Babin, Reservoir Engineer	Approx. 15 minutes	Approx. 5

PROCEDURAL MATTERS

Oxy intends to consolidate these matters for hearing.

Respectfully submitted,

HOLLAND & HART LLP



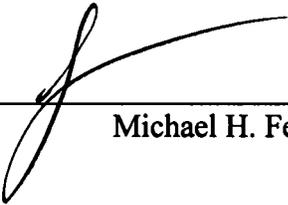
Michael H. Feldewert
Jordan L. Kessler
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
Email: MFeldewert@hollandhart.com
Email: JLKessler@hollandhart.com

ATTORNEYS FOR OXY USA INC.

CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2017, I served a copy of the foregoing document to the following counsel of record via electronic mail to:

Scott Hall
Post Office Box 2307
Santa Fe, New Mexico 87504
shall@montand.com



Michael H. Feldewert