

**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**

CASE NO. 15780

PRE-HEARING STATEMENT

Snow Oil & Gas Inc. ("Snow") and The Estate of Nona Snow, deceased (Dan Snow, Successor Personal Representative, or "Estate"), provisionally provide this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

**SNOW OIL & GAS INC. AND THE
ESTATE OF NONA SNOW, DECEASED**

**SNOW OIL & GAS INC. AND THE
ESTATE OF NONA SNOW,
DECEASED'S ATTORNEY**

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APPLICANT

OXY USA WTP Limited Partnership

APPLICANT'S ATTORNEY

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STATEMENT OF THE CASE

Applicant OXY USA WTP Limited Partnership seeks an order (1) creating 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, Township 19, Range 29 East, NMPM, Eddy County, New Mexico; and (2) pooling all uncommitted interests in the Bone Spring formation underlying this acreage.

Snow Oil and Gas, Inc. and the Estate of Nona Snow, Deceased (Dan Snow, Successor Personal Representative) both own leasehold working interests in the Applicant's proposed non-standard spacing and proration unit. The Estate appears provisionally without waiver of the right to seek the dismissal of the Application for the reason that Applicant did not issue proper notice in this case and the Division has not acquired jurisdiction over the proper party, the Successor Personal Representative.

PROPOSED EVIDENCE

OPPONENT:

EST. TIME

EXHIBITS

SNOW OIL & GAS INC. AND THE ESTATE
OF NONA SNOW, DECEASED (Dan Snow, Succesor
Personal Representative)

WITNESSES:

Joe Lindemood, Land

10 min.

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APPLICANT: OXY USA WTP Limited Partnership

EST. TIME

EXHIBITS

WITNESSES:

PROCEDURAL MATTERS

As indicated, above.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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Attorneys for Snow Oil & Gas Inc.

and The Estate of Nona Snow, deceased.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on August 24, 2017:

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