

**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. 15781**

**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**

J. Scott Hall, Esq.  
MONTGOMERY & ANDREWS, P.A.  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
Tele (505) 982-3873  
[shall@montand.com](mailto:shall@montand.com)

**APPLICANT**

**OXY USA WTP Limited Partnership**

**APPLICANT'S ATTORNEY**

Michael H. Feldewert  
Jordan L. Kessler  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, NM 87504-2208  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

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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 S/2 S/2 of Section 9, and the S/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, Successor  
Personal Representative)

### WITNESSES:

Joe Lindemood, Land

10 min.

4

APPLICANT: OXY USA WTP Limited Partnership

EST. TIME

EXHIBITS

### WITNESSES:

## PROCEDURAL MATTERS

As indicated, above.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: J. Scott Hall

J. Scott Hall  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873  
shall@montand.com

*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:

Michael H. Feldewert  
Jordan L. Kessler  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, NM 87504-2208  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

J. Scott Hall  
J. Scott Hall