

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

**APPLICATION OF OXY USA WTP LIMITED PARTNERSHIP
TO RE-OPEN CASE NO. 15780 TO POOL THE INTERESTS OF RECORD TITLE
OWNERS UNDER THE TERMS OF COMPULSORY POOLING ORDER R-14471,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 15780 (re-opened)

**APPLICATION OF OXY USA WTP LIMITED PARTNERSHIP
TO RE-OPEN CASE NO. 15781 TO POOL THE INTERESTS OF RECORD TITLE
OWNERS UNDER THE TERMS OF COMPULSORY POOLING ORDER R-14472,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 15781 (re-opened)

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

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STATEMENT OF THE CASE

Under these consolidated applications, OXY seeks to re-open Case Nos. 15780 and 15781 to compulsory pool record title owners pursuant to the terms of Division Order No. R-14471 and R-14472.

Order R-14471 created a 320-acre non-standard spacing and proration unit consisting of the N/2 S/2 of Section 9 and the N/2 S/2 of Section 10, Township 19 South, Range 29 East, NMPM in Eddy County, New Mexico, and pooled the uncommitted interest in the Bone Spring Formation (Turkey Track; Bone Spring Pool (60660)). The spacing unit was dedicated to the Turkey Track 9 10 State Com Well No. 23H (API No. 30-015-44154). OXY has been unable to obtain the signatures of the record title owners on the communitization agreements because either 1) the record title owners are deceased, their estates are in various stages of probation, and the predecessors in interest have not yet signed a communitization agreement; or 2) the record title owner is unresponsive and has not signed a communitization agreement. OXY therefore seeks to compulsory pool remaining uncommitted record title owners in the Unit pursuant to the terms of existing Division Order No. R-14471.

Order R-14472 created a 320-acre non-standard spacing and proration unit consisting of the S/2 S/2 of Section 9 and the S/2 S/2 of Section 10, Township 19 South, Range 29 East, NMPM, in Eddy County, New Mexico, and pooled the uncommitted interest in the Bone Spring Formation (Turkey Track; Bone Spring Pool (60660)). The spacing unit was dedicated to the Turkey Track 9 10 State Com Well No. 24H (API No. 30-015-44156). OXY has been unable to obtain the signatures of the record title owners on the communitization agreements because either 1) the record title owners are deceased, their estates are in various stages of probation, and the predecessors in interest have not yet signed a communitization agreement; or 2) the record title

owner is unresponsive and has not signed a communitization agreement. OXY therefore seeks to compulsory pool remaining uncommitted record title owners in the Unit pursuant to the terms of existing Division Order No. R-14472.

APPLICANT'S PROPOSED EVIDENCE

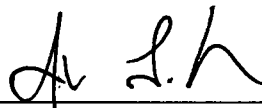
| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|---------------------------------------|-----------------------|-----------------|
| India Isbell, Landman | Approx. 10 minutes | Approx. 3 |

PROCEDURAL MATTERS

Oxy intends to consolidate these matters for hearing. If unopposed, these consolidated cases will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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**ATTORNEYS FOR OXY USA WTP LIMITED
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