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

APPLICATION OF OXY USA INC. FOR ALTERNATIVE NON-STANDARD SPACING AND PRORATION UNITS, APPROVAL OF A NON-STANDARD PROJECT AREA AS NEEDED AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

JUN 21 2018 PHO2:27

CASE NO. 16256

OXY'S PRE-HEARING STATEMENT

This pre-hearing statement is submitted by OXY USA Inc. ("OXY") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

OXY USA Inc.

Michael H. Feldewert Adam G. Rankin Julia Broggi Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208

(505) 988-4421 mfeldewert@hollandhart.com

agrankin@hollandhart.com jbroggi@hollandhart.com

STATEMENT OF THE CASE

OXY seeks an order (1) creating a 320-acre non-standard spacing and proration unit comprised of the W/2 W/2 of Section 27 and the W/2 W/2 of Section 34, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Red Tank Bone Spring (Pool No. 51683) underlying this acreage. OXY proposes to dedicate the above-referenced spacing and proration unit as the project area for its proposed **Taco Cat "27-34" Federal Com No. 11H Well** and **Taco Cat "27-34" Federal Com No. 21H Well**, which will

be horizontally drilled from surface locations in the NW/4 NW/4 (Unit D) of Section 27, Township 22 South, Range 32 East, NMPM, to bottom hole locations in the SW/4 SW/4 (Unit M) of Section 34, Township 22 South, Range 32 East, NMPM. The completed intervals for these 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
Courtney Carr, Landman	Approx. 20 minutes	Approx. 6
Cyrus Bina, Geology	Approx. 15 minutes	Approx. 5

PROCEDURAL MATTERS

OXY requests that Case Nos. 16256 and 16257 be consolidated only for hearing purposes.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
ibroggi@hollandhart.com

ATTORNEYS FOR OXY USA INC.