

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

**APPLICATION OF OXY USA INC. FOR  
COMPULSORY POOLING, EDDY COUNTY,  
NEW MEXICO.**

**CASE NO. 20552**

**OXY'S PRE-HEARING STATEMENT**

OXY USA Inc. ("OXY") (OGRID No. 16696), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

OXY USA Inc.

**ATTORNEY**

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Kaitlyn A. Luck  
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**APPLICANT'S STATEMENT OF CASE**

OXY seeks order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp Pool (98220)) underlying a standard 640-acre, more or less, horizontal well spacing unit comprised of the S/2 of Sections 15 and 16, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. OXY will dedicate this spacing unit to its proposed **Whomping Willow CC "15-16" State Com No. 44H Well**, which will be horizontally drilled from a surface location in the NE/4 SE/4 (Unit I) of Section 15 to a bottom-hole location in the

SW/4 SW/4 (Unit M) of Section 16. The completed interval for the **Whomping Willow CC “15-16” State Com No. 44H Well** will remain within the standard setback as required by the Special Rules for the Purple Sage; Wolfcamp Pool.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Jeremy Murphrey, Landman	Approx. 10	Approx. 6
Tony Troutman, Geologist	Approx. 15	Approx. 4

**PROCEDURAL MATTERS**

If uncontested, OXY will present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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