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

IN THE MATTER OF THE APPLICATION OF OXY USA WTP LIMITED PARTNERSHIP FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NO. 13,742

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Miller Stratvert P.A. (J. Scott Hall) behalf of Chase Oil Corporation, Robert C. Chase, Richard L. Chase and Gerene Dianne Chase Crouch, as required by the Oil Conservation Division. \geq

APPEARANCES

APPLICANT

ATTORNEY

OXY USA WTP Limited Partnership

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OPPONENTS

OPPONENTS' ATTORNEY

Chase Oil Corporation Robert C. Chase Richard L. Chase Gerene Dianne Chase Crouch J. Scott Hall Miller Stratvert P.A. Post Office Box 1986 Santa Fe, New Mexico 87504-1986 (505) 989-9614

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interests from the surface to the base of the Morrrow formation in the following described spacing and proration unit located in the S/2 of Section 31, Township 16 South, Range 32 East, NMPM, Lea County, New Mexico: the W/2 for all formations and/or pools developed on 320-acre spacing which includes but is not necessarily limited to the Fren Northeast-Morrow Gas Pool. OXY proposes to dedicate the above referenced spacing or proration unit to its Great Horned Owl State Well No. 1 to be drilled at a standard location 1120 feet from the South line and 1930 feet from the East line (Unit O) of said Section 31.

Also to be considered will be the cost of drilling and completing said well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of OXY USA WTP Limited Partnership as operator of the well and a charge for risk involved in drilling said well.

OPPOSITION OR OTHER PARTY

Chase Oil Corporation, et al. oppose the Application for the reason of OXY's failure to engage in meaningful negotiations to obtain their voluntary participation in the well.

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME NO. OF EXHIBITS

OPPOSITION

WITNESSES EST. TIME NO. OF EXHIBITS

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PROCEDURAL MATTERS

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