

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

CASE NO. 13742

**APPLICATION OF OXY WTP LIMITED
PARTNERSHIP FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

PRE-HEARING STATEMENT

7/13/08

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by the Oil Conservation Division.

2008 JUL 13 PM 3 08

APPEARANCES OF PARTIES

APPLICANT

OXY USA WTP Limited Partnership
Attn: David Evans
Post Office Box 4294
Houston, TX 77210-4294
(713) 366-5303

ATTORNEY

William F. Carr, Esq.
Holland & Hart LLP
Post Office Box 2297
Santa Fe, New Mexico 87504-2208
(505) 988-4421

OPPOSITION

Mack Energy Corporation
Chase Oil Corporation
Mack C. Chase as Trustee of the Mark C
and Marilyn Y. Chase Trust
Robert C. Chase
Richard L. Chase
Gerene Diane Chase Crouch
Attn: Mr. Ronald W. Lanning
P. O. Box 1767
Artesia, NM 88211-1767

ATTORNEY

J. Scott Hall, Esq.
Miller Stratvert & Torgerson, P.A.
150 Washington Avenue, Suite 300
Post Office Box 1986
Santa Fe, NM 87504-1986
(505) 989-9614

STATEMENT OF CASE

Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Morrow formation in the following described spacing and proration units located in the S/2 of Section 31, Township 16 South, Range 32 East, N.M.P.M., 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 units to its Great Horned Owl State Well No. 1 to be drilled at a standard gas well 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 cost 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. Said area is located approximately 3 miles northwest of Maljamar, New Mexico.

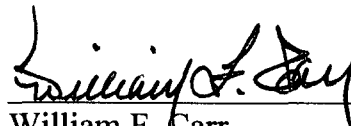
PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
David Evans (Land)	Approx. 10 Minutes	Approx. 6

PROCEDURAL MATTERS

OXY USA WTP Limited Partnership has none at this time.



William F. Carr

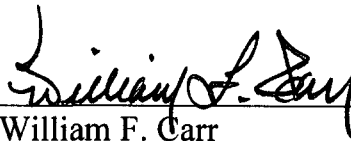
Attorney for OXY USA WTP Limited Partnership

CERTIFICATE OF SERVICE

I certify that on July 13, 2006 I served a copy of the foregoing document to the following by

- ☐ U.S. Mail, postage prepaid
- ☐ Hand Delivery
- ☒ Fax
- ☐ Electronic Service by LexisNexis File & Serve

J. Scott Hall, Esq.
Miller Stratvert & Torgerson, P.A.
150 Washington Avenue, Suite 300
Post Office Box 1986
Santa Fe, NM 87504-1986
(505) 989-9614
(505) 989-9857 facsimile



William F. Carr