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

APPLICATION OF OXY USA Inc. FOR SALT WATER DISPOSAL EDDY COUNTY, NEW MEXICO

CASE 12265

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

OXY USA Inc. 5 E Greenway Plaza Houston, Texas 77046 attn: Rick Foppiano

W. Thomas Kellahin KELLAHIN & KELLAHIN Santa Fe, NM 87504 (505) 982-4285 Pre-Hearing Statement NMOCD CASE 12265 Page 2

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STATEMENT OF THE CASE

OXY USA Inc. ("OXY") seeks approval to convert its Government Well No 9 in Unit A of Section 10, T20S, R28E to a salt water disposal well for injection into the Bone Springs formation of the Old Millman Ranch-Bone Spring Associated Pool.

Within the 1/2 mile area of review there are two Morrow gas wells both operated by OXY which do not have cement across the injection interval. OXY proposes to monitor these wells and requests approval not to perform remedial cement operations on these wells until such time as water breaks into either of these wellbores or is detected in nearby Bone Springs producers also operated by OXY.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME EXHIBITS

Richard C. Foppiano (petroleum engineer)

30 min. @ 8 exhibits

PROCEDURAL MATTERS

None

KELLAHIN AND KELLAHIN

W. Thomas Kellahin