

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

**APPLICATION OF OXY USA WTP Limited Partnership
FOR COMPULSORY POOLING
EDDY COUNTY, NEW MEXICO**

CASE 12629

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

OXY USA WTP Limited Partnership
580 Westlake Park Blvd.
Houston, Texas 77210
attn: Rick Foppiano
281-552-1303

ATTORNEY

W. Thomas Kellahin
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STATEMENT OF THE CASE

In accordance with the provision of Division Rule 1207.A(1) OXY USA WTP Limited Partnership ("OXY") seeks the issuance of a compulsory pooling order for certain mineral interests from the surface to the base of the Morrow formation underlying the S/2 Section 2, T18S, R25E, Eddy County, New Mexico.

The well is the Trombone Well No. 1 to be drilled at a standard well location in Unit P of Section 2. The possible spacing units are the S/2, the SE/4 and the SE/4SE/4 of Section 2.

The parties to be pooled are: Kemp Lumber Company, a defunct New Mexico corporation and Billy James Van Winkle

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME EXHIBITS

By affidavit:

- (1) Doug Hurlbut (landman)
- (2) Gary Womack (petroleum engineer)

PROCEDURAL MATTERS

None

KELLAHIN AND KELLAHIN

By: 
W. Thomas Kellahin