



Occidental Permian Ltd.
A subsidiary of Occidental Petroleum Corporation

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April 23, 2009

Mr. Mark Whitaker
Compliance Officer, Oil Conservation Division
Energy Minerals and Natural Resources Department
State of New Mexico
1625 N. French Drive
Hobbs, NM 88240

RECEIVED

APR 28 2009

HOBBSOCD

RE: Zebra State No.1
API 30-025-33986
Letter of Violation – iMAW0905833583

Dear Mr. Whitaker,

OXY USA Inc. is not the operator of the above referenced lease or well. OXY purchased certain leases and operations from Plains who had previously purchased POGO Producing Company. This lease was not included in the OXY acquisition and no change of operator to OXY for this well or lease was executed.

The required re-plugging of this well may be the responsibility of Plains (PXP) if they acquired the lease. The well may also fall under the orphan well program depending on when the lease expired. I am coping Mr. Bob Tierney with PXP for his follow-up as to their possible responsibility.

Please contact me if you have any questions.

Sincerely,

Elizabeth S. Bush-Ivie, P.E.
Regulatory Team Leader
713-366-5303

cc: Mr. Bob Tierney
Supervisor: Regulatory and Compliance Affairs
Plains Exploration and Production Company
717 Texas Avenue, Suite 2100
Houston, Texas 77002