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

APPLICATION OF CHEVRON U.S.A. INC. TO REOPEN CASE NO. 16436 TO MODIFY THE VERTICAL LIMITS OF THE JAVELINA UNIT, IN EDDY COUNTY, NEW MEXICO.

CASE NO. 16436 (Reopened)

### **CHEVRON'S PRE-HEARING STATEMENT**

Chevron U.S.A. Inc. ("Chevron") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

#### **APPEARANCES**

#### **APPLICANT**

#### **ATTORNEY**

Chevron U.S.A. Inc.

Earl E. DeBrine, Jr.
Zoe E. Lees
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
edebrine@modrall.com
zel@modrall.com

#### STATEMENT OF CASE

Applicant seeks approval to reopen Case No. 16436 to modify the vertical limits of the Javelina Unit consisting of approximately 5,119.76 acres of state and federal lands situated in all of Sections 1, 2, 9, 10, 11, 12, 15 and 16 of Township 24 South, Range 31 East, N.M.P.M., Eddy County, New Mexico. Applicant seeks to reduce the vertical limits of the Unit from the center of the earth to the base of the Woodford Shale, defined as the stratigraphic equivalent of a depth of 16,367 feet beneath the surface in that certain Pan Geo Atlas Corp. Laterolog survey dated May 13, 1967, in the Cotton Draw Unit 65 well (API # 30-015-10843), located in Section 2, Township 25 South, Range 31 East, Eddy County, New Mexico.

#### PROPOSED EVIDENCE

## **APPLICANT:**

**WITNESS** 

ESTIMATED TIME

**EXHIBITS** 

Chris Cooper – Land Representative

Approx. 10

5

#### PROCEDURAL MATTERS

Chevron does not have any procedural matters at this time.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS

& SISK, PA

By:\_

Earl E. DeBrine, Jr.

Zoe E. Lees

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

edebrine@modrall.com

Attorneys for Chevron U.S.A. Inc.

W3357351.DOCX