

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

**APPLICATION OF CHEVRON U.S.A.  
INC. FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

**Case No. 21113**

**APPLICATION OF CHEVRON U.S.A.  
INC. FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

**Case No. 21124**

**APPLICATION OF CHEVRON U.S.A.  
INC. FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

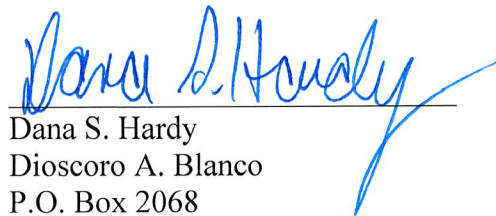
**Case No. 21125**

**KAISER-FRANCIS OIL COMPANY'S  
CONSOLIDATED AMENDED PRE-HEARING STATEMENT**

Kaiser-Francis Oil Company ("Kaiser-Francis") filed its Pre-Hearing Statement on February 27, 2020, objecting to Chevron U.S.A. Inc.'s ("Chevron") applications based on Chevron's plan to back-build north into Section 24, Township 23 South, Range 28 East, where Kaiser-Francis is drilling the Brantley Fee 2419 WC #2H well. Subsequent to the filing of Kaiser-Francis's Pre-Hearing Statement, Chevron agreed to revise its directional plans and has confirmed that it no longer intends to back-build north into Section 24. Chevron has also agreed to notify the Division and Kaiser-Francis if Chevron revises its directional plans to include back-building north into Section 24 and that Kaiser-Francis reserves the right to request that the Division re-open these matters in that circumstance. Based on these agreements, Kaiser-Francis withdraws its objections to Chevron's applications.

Respectfully submitted,

HINKLE SHANOR, LLP



Dana S. Hardy  
Dioscoro A. Blanco  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
Phone: (505) 982-4554  
Facsimile: (505) 982-8623  
dhardy@hinklelawfirm.com  
dblanco@hinklelawfirm.com

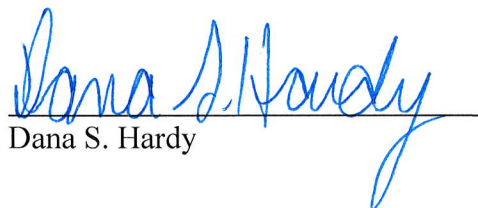
*Counsel for Kaiser-Francis Oil Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of March, 2020, I sent a true and correct copy of Kaiser-Francis Oil Company's Consolidated Amended Pre-Hearing Statement via email to:

Michael H. Feldewert  
Adam G. Rankin  
Kaitlyn A. Luck  
P.O. Box 2208  
Santa Fe, NM 87504-2208  
Phone: (505) 988-4421  
Facsimile: (505) 983-6043  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
kaluck@hollandhart.com

*Attorneys for Chevron U.S.A., Inc.*



Dana S. Hardy