

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

**APPLICATION OF CHEVRON U.S.A.  
INC. FOR AN OVERLAPPING  
SPACING UNIT IN THE BONE  
SPRING FORMATION AND  
COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 21499**

**APPLICATION OF CHEVRON U.S.A.  
INC. FOR AN OVERLAPPING  
SPACING UNIT IN THE WOLFCAMP  
FORMATION AND COMPULSORY  
POOLING, EDDY COUNTY,  
NEW MEXICO.**

**CASE NO. 21500**

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

This consolidated pre-hearing statement is submitted by Chevron U.S.A. Inc. ("Chevron")  
as required by the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Chevron U.S.A. Inc.  
1400 Smith Street  
Houston, Texas 77002

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
kaluck@hollandhart.com

## OTHER APPEARANCES

Mewbourne Oil Company

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

## STATEMENT OF THE CASE

In **Case No. 21499**, Chevron seeks an order (1) approving a 640-acre, more or less, overlapping spacing unit in the Bone Spring formation, and (2) pooling all uncommitted interests in the Third Bone Spring interval of the Bone Spring formation (Culebra Bluff; Bone Spring, South Pool [Pool Code 15011]), from a depth of 9,227 feet to the base of the Bone Spring formation at a depth of 9,541, underlying the E/2 of Sections 26 and 35, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Chevron proposes to dedicate the above-referenced spacing unit to the proposed initial **CB TANO 26 35 FEE 11 301H Well** (API No. 30-015-47379), to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 26 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 35. The completed interval of this well will comply with statewide setbacks for oil wells.

In **Case No. 21500**, Chevron seeks an order (1) approving a 640-acre, more or less, overlapping spacing unit in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool [Pool Code 98220]), and (2) pooling all uncommitted interests in the Upper Wolfcamp interval of the Wolfcamp formation, from a depth of 9,541 feet, to the base of the Wolfcamp C formation, at a depth of 10,541 feet, underlying the E/2 of Sections 26 and 35, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Chevron proposes to dedicate the above-referenced spacing unit to the following proposed wells:

- The **CB TANO 26 35 FEE 11 401H Well** (API No. 30-015-47378) to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 26 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 35; and
- The **CB TANO 26 35 FEE 11 402H Well** (API No. 30-015-47380) and the **CB TANO 26 35 FEE 11 403H Well** (API No. 30-015-47381), both are to be horizontally drilled from surface hole locations in the NE/4 NE/4 (Unit A) of Section 26 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 35.

Pursuant to the Special Rules for the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220), the completed interval for each of these proposed initial wells will comply with the 330-foot setback requirement.

#### **APPLICANT'S PROPOSED EVIDENCE**

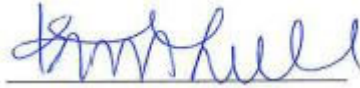
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Chris Cooper, Landman	Affidavit	Approx. 5
Jeremiah Moody, Geologist	Affidavit	Approx. 4

#### **PROCEDURAL MATTERS**

Chevron intends to present these cases by affidavits because Mewbourne has withdrawn its opposition and the cases will be uncontested at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



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Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
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(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
kaluck@hollandhart.com

**ATTORNEYS FOR CHEVRON U.S.A. INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 12, 2020, I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

*Attorney for Mewbourne Oil Company*



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Kaitlyn A. Luck