

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

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**IN THE MATTER OF THE  
APPLICATION OF CHEVRON USA INC.  
FOR A NON-STANDARD SPACING  
AND PRORATION UNIT AND  
COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

**CASE NO. 15074**

**PRE-HEARING STATEMENT**

This Pre-hearing Statement is submitted by Endurance Resources, LLC by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT:**

Chevron U.S.A., Inc.  
Michael H. Feldewert  
Holland & Hart  
PO Box 2208  
Santa Fe, NM 87504-2208  
(505)988-4421

**ATTORNEY:**

Ernest L. Padilla  
Padilla Law Firm, P.A.  
P.O. Box 2523  
Santa Fe, New Mexico 87504  
Attorney for Endurance Resources, LLC  
(505) 988-7577

**OPPOSITION OR OTHER PARTY:**

Endurance Resources, LLC

**STATEMENT OF CASE**

**APPLICANT:**

**OPPOSITION OR OTHER PARTY:**

Endurance Resources, LLC opposes the application of Chevron U.S.A. Inc. on the basis that it proposes a spacing and proration unit composed of the E/2 of Section 18, Township 23 South, Range 24 East, NMPM, Lea County, New Mexico. Endurance Resources, LLC has filed its own case in OCD Case No. 15084 a copy of the Endurance Resources, LLC application is attached hereto as Exhibit A.

**PROPOSED EVIDENCE**

**APPLICANT**

WITNESSES

EST. TIME

EXHIBITS

**OPPOSITION**

WITNESSES

EST. TIME

EXHIBITS

Don Ritter  
(Engineer)

45 min.

Engineering related exhibits

OR

Manny Sirgo  
(Engineer)

45 min.

Calculation to the benefit of  
recovery through a North  
South oriented well

Randall Harris  
(Geologist)

30 min.

Geologist Structure maps  
Type Log  
Geologic Evidence showing  
Natural Fracturing in the area

Jason South  
(Land man)

30 min.

Land maps  
Land ownership  
Joinder information  
Notice requirements

Ernest L. Padilla

Affidavit of Service

**PROCEDURAL MATTERS**

Endurance Resources, LLC moves the Division to consolidate the Chevron U.S.A. Inc. application and the Endurance Resources, LLC application, on the basis that the applications deal with the same land and on the basis that Endurance Resources, LLC, has not received 20 day notice and therefore the application should be continued to February 6, 2014.

PADILLA LAW FIRM, P.A.



ERNEST L. PADILLA

Attorney for Endurance Resources, LLC

PO Box 2523

Santa Fe, New Mexico 87504

505-988-7577

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of this Pre-Hearing Statement to be served upon, Chevron U.S.A., Inc., Michael H. Feldewert, Holland & Hart, PO Box 2208, Santa Fe, NM 87504-2208, by electronic mail to [mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com) this 16<sup>th</sup> day of January, 2014.



ERNEST L. PADILLA