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

APPLICATION OF CHEVRON U.S.A. INC. FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 16132

APPLICATION OF CHEVRON U.S.A. INC. FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 16133

APPLICATION OF TAP ROCK RESOURCES, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 16134

APPLICATION OF TAP ROCK RESOURCES, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 16160

PRE-HEARING STATEMENT

Vladin, LLC ("Vladin"), provisionally provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

VLADIN, LLC

VLADIN, LLC's ATTORNEY

J. Scott Hall, Esq.
Seth C. McMillan
MONTGOMERY & ANDREWS, P.A.

P.O. Box 2307

Santa Fe, NM 87504-2307

Tele (505) 982-3873

 $\underline{shall@montand.com}$

smcmillan@montand.com

OTHER PARTIES

OTHER PARTIES' ATTORNEYS

CHEVRON U.S.A. INC. Gary W. Larson

Hinkle Shanor LLP

P.O. Box 2068

Santa Fe, NM 87504-2068 glarson@hinklelawfirm.com

TAP ROCK RESOURCES, LLC

James Bruce

Post Office Box 1056 Santa Fe, NM 87504 jamesbruc@aol.com

DOUGLAS McLEOD

Earl E. DeBrine, Jr.

Jennifer Bradfute

Modrall, Sperling, Roehl, Harris & Sisk,

P.A.

Post Office Box 2168 Albuquerque, NM 87103

ilb@modrall.com

earl.debrine@modrall.com

EOG RESOURCES, INC.

Ernest L. Padilla

Padilla Law Firm, P.A.

P.O. Box 2523

Santa Fe, NM 87504

padillalaw@gwestoffice.net

STATEMENT OF THE CASE

The Applications for compulsory pooling and non-standard units filed in these matters present conflicting proposals for the development of Bone Spring and Wolfcamp formation reserves underlying Sections 11 and 14 in T24S R31E in Eddy County. Additionally, EOG Resources is proposing wells and units in Section 14 and 23 in T24S R31E.

Vladin, LLC owns leasehold interests underlying the S/2 of Section 14 in T24S R31E.

PROPOSED EVIDENCE

VLADIN, LLC

EST. TIME

EXHIBITS

WITNESSES:

None.

N/A

PROCEDURAL MATTERS

Vladin, LLC appears in these matters provisionally, without waiver of its right to challenge jurisdiction, absence of notice or any other procedural defect.

Counsel for Vladin, LLC was not engaged until after the deadline for filing pre-hearing statements had passed. Counsel respectfully requests the Examiners' leave to cross-examine witnesses and introduce evidence of its own.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By:_

J. Scott Hall

Seth C. McMillan

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

shall@montand.com

smcmillan@montand.com

Attorneys for Vladin, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on May 16, 2018:

Earl E. DeBrine, Jr.
Jennifer Bradfute
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, NM 87103
jlb@modrall.com
earl.debrine@modrall.com

Post Office Box 1056 Santa Fe, NM 87504 jamesbruc@aol.com

James Bruce

Attorney for Tap Rock Resources, LLC

Attorneys for Douglas McLeod

Gary W. Larson Hinkle Shanor LLP P.O. Box 2068 Santa Fe, NM 87504-2068 glarson@hinklelawfirm.com

Attorneys for Chevron U.S.A. Inc.

Ernest L. Padilla
Padilla Law Firm, P.A.
P.O. Box 2523
Santa Fe, NM 87504
padillalaw@qwestoffice.net

Attorneys for EOG Resources, Inc.

7. Scou nau

J. Scott Hall