

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

**APPLICATION OF CHASE OIL
CORPORATION FOR COMPULSORY POOLING,
CHAVES COUNTY, NEW MEXICO.**

CASE NO. 26374

CHASE'S PRE-HEARING STATEMENT

Chase Oil Corporation ("Chase" or "Applicant"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Chase Oil Corporation
("Chase")

ATTORNEY

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Holland & Hart LLP
215 Lincoln Avenue, Suite 100
Santa Fe, New Mexico 87501
(505) 988-4421
(505) 983-6043 Facsimile

APPLICANT'S STATEMENT OF THE CASE

Under **Case No. 26374**, Chase seeks an order pooling the uncommitted interest owners in a standard 160-acre, more or less, horizontal well spacing unit in the San Andres formation (Round Tank; San Andres [52770]) underlying the W/2 W/2 of Section 23, Township 15 South, Range 29 East, NMPM, Chaves County, New Mexico.

Chase seeks to initially dedicate the spacing unit to the proposed **Alberta Federal Com 1H** (API No. 30-005-64407) and **Alberta Federal Com 2H** (API No. 30-005-64408) wells, both to be horizontally drilled from surface locations in the SW/4 SW/4 (Unit M) of Section 14, with first take points in the NW/4 NW/4 (Unit D) of Section 23, and last take points in the SW/4

SW/4 (Unit M) of Section 23.

The completed interval for the well will meet the statewide setbacks for oil wells. Chase has reached a voluntary agreement with all working interest owners in this proposed unit but seeks a pooling order for certain non-cost-bearing interest owners, including overriding royalty interest owners, who have yet to execute the necessary federal and state communitization agreements. Chase has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Derik Smith, Landman	Self-Affirmed Statement	Approx. 3
Tyler Greenwood, Geologist	Self-Affirmed Statement	Approx. 5

PROCEDURAL MATTERS

Chase intends to present this case by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
215 Lincoln Avenue, Suite 100
Santa Fe, New Mexico 87501
(505) 988-4421
(505) 983-6043 Facsimile
agrarkin@hollandhart.com
pmvance@hollandhart.com
arstarnes@hollandhart.com

**ATTORNEYS FOR CHASE OIL COMPANY &
MACK ENERGY CORPORATION**

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 618397

QUESTIONS

Operator: MACK ENERGY CORP P.O. Box 960 Artesia, NM 882110960	OGRID: 13837
	Action Number: 618397
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.