

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

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

**Case Nos. 22343 & 22344**

**APPLICATIONS OF CIMAREX ENERGY CO. FOR HORIZONTAL SPACING UNITS AND FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO**

**Case Nos. 22519 & 22520**

**CHEVRON'S PRE-HEARING STATEMENT**

Chevron U.S.A. Inc. ("Chevron") (OGRID No. 4323) submits this pre-hearing statement, 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  
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

**OTHER PARTIES**

Cimarex Energy Co.

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
505-982-2043  
jamesbruc@aol.com

MRC Permian Company and  
MRC Permian LKE Company, LLC

Kyle Perkins  
5400 LBJ FWY, Suite 1500  
Dallas, Texas 75240  
(972) 371-5202  
kperkins@matadorresources.com

### **STATEMENT OF THE CASE**

In these consolidated cases Chevron seeks to pool standard horizontal well spacing units for two-mile laterals in the Purple Sage; Wolfcamp (Gas) Pool [98220] underlying Sections 17 and 20, Township 25 South, Range 27 East, NMPM, Eddy County, New Mexico, as follows:

- Under **Case 22343**, Chevron seeks to pool the E/2 of Sections 17 and 20 to be initially dedicated to the proposed (a) **Glenfiddich 20 17 Fed Com 46 #1H** and **#2H** wells to be horizontally drilled from a common surface hole location in the SE/4 SE/4 (Unit P) of Section 20 to bottom hole locations in the NW/4 NE/4 (Unit B) of Section 17, and (b) the **Glenfiddich 20 17 Fed Com 46 #3H** and **#4H** wells to be horizontally drilled from the same common surface hole location in the SE/4 SE/4 (Unit P) of Section 20 to bottom hole locations in the NE/4 NE/4 (Unit A) of Section 17.
- Under **Case 22344**, Chevron seeks to pool the W/2 of Sections 17 and 20 to be initially dedicated to the proposed (a) **Grey Goose 20 17 Fed Com 45 #1H** and **#2H** wells to be horizontally drilled from a common surface hole location in the SW/4 SW/4 (Unit M) of Section 20 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 17, and (b) the **Grey Goose 20 17 Fed Com 45 #3H** and **#4H** wells to be horizontally drilled from the same surface hole location in the SW/4 SW/4 (Unit M) of Section 20 to bottom hole locations in the NE/4 NW/4 (Unit C) of Section 17.

Cimarex Cases 22519 and 22520 seek to create competing Wolfcamp spacing units that combine Section 8 with Sections 17 and 20, thereby overlapping the spacing units initially proposed by Chevron in the E/2 and the W/2 of Sections 17 and 20.

Chevrons believes that the following facts are undisputed and material to the issues presented in these consolidated cases:

1. The Cimarex competing pooling cases overlap Chevron's proposed spacing units in Sections 17 and 20, where Chevron owns over 64% of the working interest and Cimarex only owns around 26% of the working interest.

2. Chevron seek to develop the Upper Wolfcamp A sands/shales underlying Sections 17 and 20 with a an 8-well per section staggered "wine rack" pattern that will be drilled and then sequentially completed to increase the completion efficiency of these wells.

3. Cimarex has proposed to develop the Upper Wolfcamp A sands/shales underlying Sections 17 and 20 with only 4 wells per section at the same depth.

4. There are no faults, pinch outs, or other geologic impediments to efficiently and effectively developing the targeted Upper Wolfcamp A intervals with 2-mile horizontal wells oriented south to north from Section 20.

5. Sections 17 and 20 are part of Chevron's Northwest Hayhurst Development Area, a six-section area where Chevron owns most of the working interest.

6. Chevron's Northwest Hayhurst Development Area will utilize a centralized facility for Bone Spring and Wolfcamp development that will tie into the nearby Hayhurst New Mexico Solar Project approved by the New Mexico State Land Office for the purpose of electrifying facilities and reducing the necessary air emissions for oil and gas development.

### **PROPOSED EVIDENCE**

Chevron has filed affidavits for the following witnesses and intends to call them at the hearing in these consolidated matters:

Chris Cooper, Petroleum Landman

Karl Bloor, Petroleum Geologist

Bradley Hulme, Petroleum Engineer

Andrew Tabije, Petroleum Facilities Engineer

**PROCEDURAL MATTERS**

Pursuant to the Amended Prehearing Order entered in these matters, Chevron has filed with this prehearing statement affidavits containing the direct testimony for each witness, the exhibits referenced in those affidavits, and the notice affidavits and exhibits.

Respectfully submitted,

HOLLAND & HART LLP



---

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
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

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

**CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
505-982-2043  
*jamesbruc@aol.com*

***Attorney for Cimarex Energy Co.***

Kyle Perkins  
MRC Permian Company  
Vice President and Assistant General Counsel  
5400 LBJ Freeway, Suite 1500  
Dallas, TX 75240  
TEL: (972) 371-5202  
*kperkins@matadorresources.com*

***Attorney for MRC Permian Company***



---

Michael H. Feldewert

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 89794

**QUESTIONS**

Operator: CHEVRON U S A INC 6301 Deauville Blvd Midland, TX 79706	OGRID: 4323
	Action Number: 89794
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

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