

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

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

CASE NO. 23323

APPLICANT’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

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OTHER PARTIES

Coterra Energy, Inc. and its subsidiaries
incl. Cimarex Energy Co. and Magnum
Hunter Production, Inc.

ATTORNEY

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STATEMENT OF THE CASE

Chevron seeks an order pooling all uncommitted interests in the Wolfcamp formation, underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 3 and 10 within 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 Amilyn 10 3 Fed Com P13 401H, 402H and 403H** wells, which will be horizontally drilled from a common surface location in the NE/4 NW/4 (Unit C) of Section 15 to bottom hole locations in the NW/4 NW/4 (Unit D) and the NE/4 NW/4 (Unit C) of Section 3.

Also, to be considered will be the cost of drilling and completing the well, the allocation of the cost thereof, the operating costs and charges for supervision, the designation of applicant as operator, and a 200% charge for risk involved in drilling and completing the well.

Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all the working interest owners in the subject spacing unit. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Douglas Crawford, Landman	Self-Affirmed Statement	Approx. 5
Natthawee Hinthong, Geologist	Self-Affirmed Statement	Approx. 5

PROCEDURAL MATTERS

Chevron intends to present this case by affidavits if uncontested at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



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ATTORNEYS FOR CHEVRON U.S.A. INC.

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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State of New Mexico
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QUESTIONS

Action 180103

QUESTIONS

Operator: CHEVRON U S A INC 6301 Deauville Blvd Midland, TX 79706	OGRID: 4323
	Action Number: 180103
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<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>