

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

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

CASE NOS. 23568 & 23569

CHEVRON'S CONSOLIDATED PRE-HEARING STATEMENT

Chevron U.S.A. Inc. ("Chevron" or "Applicant"), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Chevron U.S.A. Inc.
("Chevron")

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
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
pmvance@hollandhart.com

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, Chevron seeks orders pooling all uncommitted interests in the Lower Bone Spring formation (Antelope Ridge; Bone Spring, West [98133]), underlying the referenced acreage all in Township 23 South, Range 34 East, NMPM, Lea County, New Mexico, as follows:

- Under **Case No. 23568**, Chevron seeks to pool a standard 320-acre, more or less, horizontal well spacing unit comprised of the W/2 E/2 of Sections 22 and 27, and initially dedicate this Bone Spring spacing unit to the proposed **ZN 27 22 Fed State Com 401H** well, to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 34 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 22.
- Under **Case No. 23569**, Chevron seeks to pool a standard 320-acre, more or less, horizontal well spacing unit comprised of the E/2 E/2 of Sections 22 and 27, and initially dedicate this Bone Spring spacing unit to the proposed **ZN 27 22 Fed State Com 402H** well, to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 34 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 22.

The first take point for each of the wells will be at a non-standard location; therefore, Chevron will apply separately by administrative application. Chevron has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject acreage.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Corie Mathews, Landman	Self-Affirmed Statement	Approx. 6
Kat Hoffman, Geologist	Self-Affirmed Statement	Approx. 6

PROCEDURAL MATTERS

Chevron requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR CHEVRON U.S.A. INC.

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 220851

QUESTIONS

Operator: CHEVRON U S A INC 6301 Deauville Blvd Midland, TX 79706	OGRID: 4323
	Action Number: 220851
	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>