

**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. 23570 & 23571**

**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 Wolfcamp formation (WC-025 G-06 S233423N; Wolfcamp [98242]), underlying the referenced acreage all in Township 23 South, Range 34 East, NMPM, Lea County, New Mexico, as follows:

- Under **Case No. 23570**, 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 Wolfcamp spacing unit to the proposed **ZN 27 22 Fed State Com 601H** 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. 23571**, 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 Wolfcamp spacing unit to the proposed **ZN 27 22 Fed State Com 602H** 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**


<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
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 220856

**QUESTIONS**

Operator: CHEVRON U S A INC 6301 Deauville Blvd Midland, TX 79706	OGRID: 4323
	Action Number: 220856
	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>