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. 24792 & 24793

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

ATTORNEY

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

Michael H. Feldewert
Adam G. Rankin
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
agrankin@hollandhart.com
pmvance@hollandhart.com

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, Chevron seeks orders pooling all uncommitted interests in the Bone Spring formation (Red Tank; Bone Spring, East [15687]) as follows:

• Under Case No. 24792, Chevron seeks to pool the uncommitted interests in a standard 480-acre, more or less, horizontal well spacing unit comprised of the W/2 of Section 33, Township 21 South, Range 33 East, and Lots 3 & 4 and the S/2 NW/4 (NW/4 equivalent) of irregular Section 4, Township 22 South, Range 33 East,

NMPM, Lea County, New Mexico, and initially dedicate this Bone Spring spacing unit to the proposed **DL 4 33 Federal 401H** and **DL 4 33 Federal 402H** wells, to be horizontally drilled from a common surface location in the SE/4 NW/4 (Unit F) of irregular Section 4, T22S-R33E, with first take points in the SW/4 NW/4 (Unit E) of irregular Section 4, T22S-R33E, and last take points in the NW/4 NW/4 (Unit D) of Section 33, T21S-R33E; and **DL 4 33 Federal 403H** well, to be horizontally drilled from a common surface location in the SE/4 NW/4 (Unit F) of irregular Section 4, T22S-R33E, with a first take point in the SE/4 NW/4 (Unit F) of irregular Section 4, T22S-R33E, and last take point in the NE/4 NW/4 (Unit C) of Section 33, T21S-R33E.

Under Case No. 24793, Chevron seeks to pool the uncommitted interests in a standard 480-acre, more or less, horizontal well spacing unit comprised of the SW/4 of Section 4 and the W/2 of Section 9, Township 22 South, Range 33 East, NMPM, Lea County, New Mexico, and initially dedicate this Bone Spring spacing unit to the proposed **DL 4 9 Federal 413H** and **DL 4 9 Federal 414H** wells, to be horizontally drilled from a common surface location in the SE/4 NW/4 (Unit F) of Section 4, with first take points in the NW/4 SW/4 (Unit L) of Section 4 and last take points in the SW/4 SW/4 (Unit M) of Section 9; and **DL 4 9 Federal 415H** well, to be horizontally drilled from a surface location in the SE/4 NW/4 (Unit F) of Section 4, with a first take point in the NE/4 SW/4 (Unit K) of Section 4 and last take point in the SE/4 SW/4 (Unit N) of Section 9.

The completed interval of the **DL 4 33 Federal 402H** and **DL 4 9 Federal 414H** are expected to remain within 330 feet of the adjoining quarter-quarter section (or equivalent) tracts to allow

inclusion of these proximity tracts within the proposed horizontal spacing unit under 19.15.16.15.B(1)(b) NMAC.

The completed interval for each of the wells will comply with statewide setbacks for oil wells. Applicant owns 100 percent of the working interest in Case No. 24793 and has voluntary agreement from the other working interest owners in Case No. 24792 and, therefore, seeks to pool only non-cost-bearing interest owners, including overriding royalty interest owners, whose interests have not been pooled within the subject spacing unit.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Nicholas Angelle, Landman	Self-Affirmed Statement	Approx. 3
Jason Parizek, Geologist	Self-Affirmed Statement	Approx. 4

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: tak

Michael H. Feldewert

Adam G. Rankin

Paula M. Vance

Post Office Box 2208

Santa Fe, NM 87504

505-988-4421

505-983-6043 Facsimile

mfeldewert@hollandhart.com

agrankin@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 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 380945

QUESTIONS

Operator:	OGRID:
CHEVRON U S A INC	4323
6301 Deauville Blvd	Action Number:
Midland, TX 79706	380945
	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.	