

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

**APPLICATION OF CHEVRON U.S.A. INC.  
TO AMEND ORDER R-20859,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 21843  
(formerly Case No. 20768)**

**APPLICATION OF CHEVRON U.S.A. INC.  
TO AMEND ORDER R-21409,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 21844  
(formerly Case No. 21240)**

**APPLICATION OF CHEVRON U.S.A. INC.  
TO AMEND ORDER R-21418,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 21845  
(formerly Case No. 21244)**

**APPLICATION OF CHEVRON U.S.A. INC.  
TO AMEND ORDER R-21465,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 21846  
(formerly Case No. 21242)**

**APPLICATION OF CHEVRON U.S.A. INC.  
TO AMEND ORDER R-21467,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 21847  
(formerly Case No. 21246)**

**CHEVRON'S CONSOLIDATED PRE-HEARING STATEMENT**

Chevron U.S.A. Inc. ("Chevron") provides this Consolidated Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

**APPLICANT**

Chevron U.S.A. Inc.

**APPLICANT'S ATTORNEY**

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**STATEMENT OF THE CASES**

**Case No. 21843:** Chevron seeks an order amending Order No. R-20859, issued on September 13, 2019, to retroactively extend the deadline for completing the initial wells for one year to February 1, 2022. Order No. R-20859 pooled all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the E/2 of Section 9 and E/2 of Section 16, Township 22 South, Range 33 East, NMPM, Lea County, New Mexico, and requires that operator commence completion operations on at least one of the wells within one year after commencement of drilling operations unless the operator obtains an extension from the Division Director for good cause shown. The three initial wells, (1) the **DL 9 16 Loch Ness Fed Com 16H** well; (2) the **DL 9 16 Loch Ness Fed Com 17H** well; and (3) the **DL 9 16 Loch Ness Fed Com 18H** well, were commenced on February 1, 6 and 8, 2020, respectively, and successfully drilled to planned total depth.

**Case No. 21844:** Chevron seeks an order amending Order No. R-21409, issued on July 29, 2020, to extend the deadline to commence drilling the initial wells for two years to July 29, 2023. Order No. R-21409 pooled all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the E/2 of Section 3 and E/2 of Section 10, Township 22 South, Range 33 East, NMPM, Lea County, New Mexico, and requires that operator commence drilling operations within one year after the date of the order unless the operator obtains an extension by amending the order for good cause shown. The initial wells to be drilled within the unit are: (1) the **DL 10 3 Morag Fed Com 210H** well; (2) the **DL 10 3 Morag Fed Com 211H** well; (3) the **DL 10 3 Morag Fed Com 212H** well; and (4) the **DL 10 3 Morag Fed Com 506H** well.

**Case No. 21845:** Chevron seeks an order amending Order No. R-21418, issued on August 7, 2020, to extend the deadline to commence drilling the initial wells for one year to August 7, 2022. Order No. R-21418 pooled all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the W/2 of Section 3 and W/2 of Section 10, Township 22 South, Range 33 East, NMPM, Lea County, New Mexico, and requires that operator commence drilling operations within one year after the date of the order unless the operator obtains an extension by amending the order for good cause shown. The initial wells to be drilled within the unit are: (1) the **DL 10 3 Kraken Fed Com 207H** well; (2) the **DL 10 3 Kraken Fed Com 208H** well; (3) the **DL 10 3 Kraken Fed Com 209H** well; (4) the **DL 10 3 Kraken Fed Com 504H** well; and (5) **DL 10 3 Morag Fed Com 505H** well.

**Case No. 21846:** Chevron seeks an order amending Order No. R-21465, issued on September 21, 2020, to extend the deadline to commence drilling the initial wells for one year to September 21, 2022. Order No. R-21465 pooled all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the E/2 of Section 15 and E/2 of Section 22, Township 22 South, Range 33 East, NMPM, Lea County, New Mexico, and requires that operator commence drilling operations within one year after the date of the order unless the operator obtains an extension by amending the order for good cause shown. The initial wells to be drilled within the unit are: (1) the **DL 15 22 Ogopogo Fed Com 222H** well; (2) the **DL 15 22 Ogopogo Fed Com 223H** well;

(3) the **DL 15 22 Ogopogo Fed Com 224H** well; and (4) the **DL 15 22 Ogopogo Fed Com 512H** well.

**Case No. 21847:** Chevron seeks an order amending Order No. R-21467, issued on September 21, 2020, to extend the deadline to commence drilling the initial wells for one year to September 21, 2022. Order No. R-21467 pooled all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the W/2 of Section 15 and W/2 of Section 22, Township 22 South, Range 33 East, NMPM, Lea County, New Mexico, and requires that operator commence drilling operations within one year after the date of the order unless the operator obtains an extension by amending the order for good cause shown. The initial wells to be drilled within the unit are: (1) the **DL 15 22 Narwhal Fed Com 219H** well; (2) the **DL 15 22 Narwhal Fed Com 220H** well; (3) the **DL 15 22 Narwhal Fed Com 221H** well; (4) the **DL 15 22 Narwhal Fed Com 510H** well; and (5) **DL 15 22 Ogopogo Fed Com 511H** well.

### PROPOSED EVIDENCE

Chevron U.S.A. Inc.

WITNESS	ESTIMATED TIME	EXHIBITS
Kevin C. Stubbs Land	Approx. 10 minutes	Approx. 25 exhibits

### PROCEDURAL MATTERS

The referenced cases should be consolidated for hearing. At the time of filing of this Pre-Hearing Statement no party has entered an appearance. Applicant intends to present these cases by affidavit.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

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*Attorneys for Chevron U.S.A. Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of CHEVRON'S CONSOLIDATED PRE-HEARING STATEMENT was served by electronic mail this 29th day of April 2021, as follows:

New Mexico Oil Conservation Division Hearings  
[ocd.hearings@state.nm.us](mailto:ocd.hearings@state.nm.us)

  
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Grace Go-Hoveland