

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF CHEVRON U.S.A. INC. FOR
APPROVAL OF THE JAVELINA UNIT AND
SURFACE COMMINGLING, EDDY COUNTY,
NEW MEXICO.**

Case No. 16436

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Douglas C. McLeod ("McLeod") and Petrogulf Corporation ("Petrogulf") as required by the regulations of the Oil Conservation Division.

APPEARANCES

APPLICANT
Chevron U.S.A.

APPLICANT'S ATTORNEY
Jennifer L. Bradfute

OTHER PARTY
Douglas C. McLeod
and Petrogulf Corporation

OTHER PARTY'S ATTORNEY
James Bruce

Titus Oil & Gas, LLC

James Bruce

STATEMENT OF THE CASE

APPLICANT

Chevron U.S.A. Inc. ("Chevron") seeks approval of its Javelina Unit containing approximately 5,119.76 acres of state and federal lands situated in all of Sections 1, 2, 9, 10, 11, 12, 15 and 16 of Township 24 South, Range 31 East, N.M.P.M., Eddy County, New Mexico. The unitized interval includes all formations of the below the top of the Bone Spring formation. In addition, Chevron seeks approval to surface commingle production from the Bone Spring and Wolfcamp formations underlying the unit.

OTHER PARTY

McLeod owns working interests (varying by depth) in the S/2 of Section 11. Petrogulf is the operator for McLeod. In other cases pending before the Division, Chevron has proposed wells

(which will be Unit wells) which include McLeod's acreage. McLeod is interested in the development of his acreage, and thus is interested in Chevron's development plan for the Unit.

McLeod and Petrogulf do not oppose formation of the Unit.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Dan Plazak

EST. TIME

15 min.

EXHIBITS

Approx. 2

OTHER PARTY

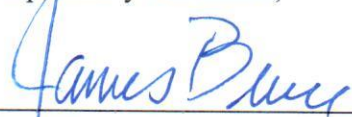
WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted,



James Bruce
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Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Douglas C. McLeod and
Petrogulf Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 27th day of September, 2018 by e-mail:

Jennifer L. Bradfute
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James Bruce