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

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

CASE NO. 22822

PRE-HEARING STATEMENT

Chevron U.S.A. Inc. ("Chevron") submits this Pre-Hearing Statement for the abovereferenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT **ATTORNEY**

CHEVRON U.S.A. INC Earl E. DeBrine

> Deana M. Bennett Jamie L. Allen Bryce H. Smith

MODRALL, SPERLING, ROEHL,

HARRIS & SISK, P.A.

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OTHER PARTIES ATTORNEY

CONOCOPHILLIPS COMPANY and COG PRODUCTION LLC

Ocean Munds-Dry Elizabeth A. Ryan **CONOCOPHILLIPS** 1048 Paseo de Peralta

Santa Fe, New Mexico 87501

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STATEMENT OF THE CASE

APPLICANT:

In Case No. 22822, Chevron seeks an order from the Division pooling all uncommitted mineral interest owners within a Bone Spring horizontal spacing unit underlying the E/2 of Sections 34 and 27, Township 24 South, Range 32 East, N.M.P.M., Lea County, New Mexico. The unit will be dedicated to CO Grizzly 34 27 Fed Com 407H, CO Grizzly 34 27 Fed Com 408H, and CO Grizzly 34 27 Fed Com 409H wells, to be horizontally drilled. Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual

operating costs and charges for supervision, designation of Chevron U.S.A Inc. as operator of the well, a 200% charge for the risk involved in drilling and completing the wells. The unit is located approximately 30 miles northwest of Jal, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESS ESTIMATED TIME EXHIBITS

Landman: Kevin Stubbs Approx. 15 minutes Approx. 8

Geologist: Mandy Brewer Approx. 15 minutes Approx. 7

PROCEDURAL ISSUES

No opposition is expected and Chevron intends to present this case by affidavit.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By:/s/ Earl E. DeBrine, Jr.

Earl E. DeBrine, Jr.

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Attorneys for Chevron U.S.A. Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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By: <u>/s/ Earl E. DeBrine, Jr.</u> Earl E. DeBrine, Jr.

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State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 111325

QUESTIONS

Operator:	OGRID:
CHEVRON U S A INC	4323
6301 Deauville Blvd	Action Number:
Midland, TX 79706	111325
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	2	
Testimony time (in minutes)	30	