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. 23567

CHEVRON'S PRE-HEARING STATEMENT

Chevron U.S.A. Inc. ("Chevron" or "Applicant"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

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Michael H. Feldewert

APPLICANT'S STATEMENT OF THE CASE

In Case No. 235627, Chevron seeks an order pooling all uncommitted interests in the Upper Bone Spring pool (WC-025 G-05 S233417N; UP BONE SPRING [98133]), underlying a standard 640-acre, more or less, horizontal well spacing unit comprised of the E/2 of Sections 22 and 27, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico. Chevron seeks to initially dedicate the above-referenced horizontal spacing unit to the proposed **ZN 27 22 Fed State** Com 201H and the **ZN 27 22 Fed State Com 202H** wells, both to be horizontally drilled from a

surface location in the NE/4 NE/4 (Unit A) of Section 34 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 22; and the **ZN 27 22 Fed State Com 203H** well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 34 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 22.

The completed interval of the **ZN 27 22 Fed State Com 202H** is 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 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

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Corie Mathews, Landman	Self-Affirmed Statement	Approx. 6
Kat Hoffman, Geologist	Self-Affirmed Statement	Approx. 6

PROCEDURAL MATTERS

Chevron intends to present this case by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By:

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QUESTIONS

Action 220848

QUESTIONS

Operator:	OGRID:
CHEVRON U S A INC	4323
6301 Deauville Blvd	Action Number:
Midland, TX 79706	220848
	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.	