

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

APPLICATION OF MATADOR PRODUCTION
COMPANY FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.

Case No. 20325

CHEVRON'S PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Chevron U.S.A. Inc. as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Matador Production Company
Suite 1500
5400 LBJ Freeway
Dallas, Texas 75240

Attention: Kyle Perkins
(972) 371-5202

ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

Chevron U.S.A. Inc.

OPPONENT'S ATTORNEY

Earl E. DeBrine, Jr.

STATEMENT OF THE CASE

Applicant seeks an order pooling all mineral interests in the Wolfcamp formation (Purple Sage-Wolfcamp Gas Pool) underlying a horizontal spacing unit comprised of the E/2 of Section 26, Township 23 South, Range 28 East, NMPM. The unit will be dedicated to:

- (a) The Judge Greenhill Well No. 217H, with a first take point in the SE/4SE/4 and a final take point in the NE/4NE/4 of Section 26;
- (b) The Judge Greenhill Well No. 203H, with a first take point in the SW/4SE/4 and a final take point in the NW/4NE/4 of Section 26;
- (c) The Judge Greenhill Well No. 223H, with a first take point in the SW/4SE/4 and a final take point in the NW/4NE/4 of Section 26;

- (d) The Judge Greenhill Well No. 204H, with a first take point in the SE/4SE/4 and a final take point in the NE/4NE/4 of Section 26; and
- (e) The Judge Greenhill Well No. 224H, with a first take point in the SE/4SE/4 and a final take point in the NE/4NE/4 of Section 26.

Chevron opposes Matador's application to protect its correlative rights and to present evidence and argument demonstrating that the granting of this application is not in the interests of conservation or the prevention of waste.

PROPOSED EVIDENCE

OPPONENT

| <u>WITNESS</u> | <u>ESTIMATED TIME</u> | <u>EXHIBITS</u> |
|-----------------------------|-----------------------|-----------------|
| Irwin Gutierrez, Landman | 15 | 6 |
| Tonya Richardson, Geologist | 15 | 4 |

PROCEDURAL MATTERS

Chevron requests a continuance of these cases.

Respectfully submitted,

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

By: 

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