

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

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

**CASE NO. 20332**

**CHEVRON'S PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Chevron U.S.A. Inc.  
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**ATTORNEY**

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**STATEMENT OF THE CASE**

Chevron seeks an order pooling all uncommitted interests in the Wolfcamp formation [Purple Sage; Wolfcamp (Gas) Pool (98220)] underlying a standard 640-acre horizontal spacing unit comprised of the E/2 of Sections 15 and 22, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Chevron proposes to initially dedicate the above-referenced spacing unit to three proposed wells:

- The **CB NE 15 22 002 No. 1H**, which will be horizontally drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 15 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 22;

- The **CB NE 15 22 002 No. 2H**, which will be horizontally drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 15 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 22; and
- The **CB NE 15 22 002 No. 3H**, which will be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 15 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 22.

The completed interval for each well will remain within the 330-foot offset required by the Special Rules for the Purple Sage Wolfcamp Gas Pool.

Since the proposed wells will be simultaneously drilled and completed, Chevron requests and extension of time to drill and complete an initial well within the spacing unit from the customary 120-days to 365-days.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Irvin Gutierrez, Landman	Via Affidavit	Approx 5.
Tonya Richardson, Geologist	Via Affidavit	Approx 4.

#### **PROCEDURAL MATTERS**

Chevron is not aware of any opposition to this pooling application and will therefore present this matter by affidavits.

Respectfully submitted,

HOLLAND & HART LLP



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