

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

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

CASE NOS. 20769 & 20770

CHEVRON'S CONSOLIDATED PRE-HEARING STATEMENT

This consolidated 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.
1400 Smith Street
Houston, Texas 77002

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

STATEMENT OF THE CASE

In Case No. 20769, Chevron seeks an order pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-07 S253216D; Upper Wolfcamp (98270)) underlying a standard 640-acre horizontal spacing unit comprised of the E/2 of Sections 15 and 22, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico. Chevron proposes to dedicate the above-referenced spacing unit to three initial wells:

- The **CO Yeti 15 22 Fed Com #52H Well** (API No. 30-025-45534) to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 15 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 22; and
- The **CO Yeti 15 22 Fed Com #54H Well** (API No. 30-025-45537) and the **CO Yeti 15 22 Fed Com #56H Well** (API No. 30-025-45536) to be horizontally drilled from surface hole locations in the NE/4 NE/4 (Unit A) of Section 15 to bottom hole locations in the SE/4 SE/4 (Unit P) of Section 22.

The completed interval for the proposed **CO Yeti 15 22 Fed Com #54H Well** will be within 330 feet of the quarter-quarter line separating the E/2 E/2 from the W/2 E/2 of Sections 15 and 22 to allow inclusion of this acreage into a standard 640-acre horizontal spacing unit.

In Case No. 20770, Chevron seeks an order pooling all uncommitted interests in the Bone Spring formation (WC-025 G-06 S253206M; Bone Spring (96715)) underlying a standard 640-acre horizontal spacing unit comprised of the E/2 of Sections 15 and 22, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico. Chevron proposes to dedicate the above-referenced spacing unit to three initial wells:

- The **CO Yeti 15 22 Fed Com #51H Well** (API No. 30-025-45531) to 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; and
- The **CO Yeti 15 22 Fed Com #53H Well** (API No. 30-025-45533) and the **CO Yeti 15 22 Fed Com #55H Well** (API No. 30-025-45535) to be horizontally drilled from surface hole locations in the NE/4 NE/4 (Unit A) of Section 15 to bottom hole locations in the SE/4 SE/4 (Unit P) of Section 22.

The completed interval for the proposed **CO Yeti 15 22 Fed Com #53H Well** will be within 330 feet of the quarter-quarter line separating the W/2 E/2 from the E/2 E/2 of Sections 15 and 22 to allow inclusion of this acreage into a standard 640-acre horizontal spacing unit.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Shalyce Holmes, Landman	Approx. 15 minutes	Approx. 5
Kate Schwehr, Geologist	Approx. 10 minutes	Approx. 4

PROCEDURAL MATTERS

Chevron respectfully requests these cases be consolidated for hearing.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

ATTORNEYS FOR CHEVRON U.S.A. INC.