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

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

**CASE NO. 20817** 

### **CHEVRON'S PRE-HEARING STATEMENT**

Chevron U.S.A., Inc. ("Chevron") (OGRID No. 215099) submits this Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

#### **APPEARANCES**

# <u>APPLICANT</u> <u>ATTORNEY</u>

Novo Oil & Gas Northern Delaware, LLC

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#### STATEMENT OF THE CASE

Novo seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 10 and 15, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico dedicated to the following proposed wells:

- The Saturninus Fed Corn 1510 #211H Well, the Saturninus Fed Com 1510 #212H Well, the Saturninus Fed Corn 1510 #221H Well, the Saturninus Fed Corn 1510 #231H Well, and the Saturninus Fed Com 1510 #23211 Well, each of which will be horizontally drilled from a common surface location in the SW/4 SW/4 (Unit M) of Section 15 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 10.
- The Saturninus Fed Corn 1510 #215H Well, the Saturninus Fed Corn 1510 #222H Well, the Saturninus Fed Corn 1510 #225H Well, and the Saturninus Fed Corn 1510 #235H Well, each of which will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 15 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 10.

Chevron is an interested party provided with notice of the application.

#### PROPOSED EVIDENCE

No witnesses or exhibits are anticipated to be presented.

#### PROCEDURAL MATTERS

Chevron understands that Titus Oil & Gas LLC is seeking to continue the hearing to the January 23, 2020 Examiner docket or a November 14, 2019 special hearing docket. Chevron opposes the request for continuance.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS

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By:

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Attorneys for Chevron U.S.A., Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on September 26, 2019:

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