

**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. 21041 - 21045**

**CHEVRON'S MOTION TO WITHDRAW**

Chevron U.S.A. Inc. ("Chevron"), by and through its undersigned counsel of record, hereby requests that its Applications for Compulsory Pooling identified as Case Nos. 21041, 21042, 21043, 21044 and 21045 be withdrawn. In support thereof, Chevron states as follows:

1. On January 2, 2020, Chevron filed Applications for Compulsory Pooling identified as Case Nos. 21041 – 21045. Tap Rock Resources, Inc., EOG Resources, Inc., COG Operating LLC, Michael L. and Patricia S. Stewart, Helms Oil & Gas, LLC, JAFT Investments, LLC, and Patrick K. and Shelly R. Worrell have entered appearances in Case Nos. 21041 – 21045. As of the date of this Motion, Case Nos. 21041 – 21045 are scheduled to be heard on April 30, 2020.

2. On March 31, 2020, Chevron filed Applications for Compulsory Pooling identified as Case Nos. 21240 – 21247 ("March Applications"). The March Applications cover all of the lands subject to Case Nos. 21041 – 21045, as well as additional lands. The development plan reflected in the March Applications is intended to completely replace and is in lieu of the development plan reflected in Case Nos. 21041 – 21045.

3. The March Applications are currently scheduled to be heard on May 14, 2020.

4. Notices of the March Applications have been timely mailed as required under the Divisions rules.

5. Tap Rock Resources, Inc. has advised Chevron that it does not oppose the withdrawal of Case Nos. 21041 – 21045. On April 9, 2020, Chevron's counsel sent an email to counsel for EOG Resources, Inc., COG Operating LLC, Michael L. and Patricia S. Stewart, Helms Oil & Gas, LLC, JAFT Investments, LLC, and Patrick K. and Shelly R. Worrell regarding this request for withdrawal of Case Nos. 21041 – 21045. To date, Chevron has not received a response from EOG Resources, Inc., COG Operating LLC, Michael L. and Patricia S. Stewart, Helms Oil & Gas, LLC, JAFT Investments, LLC, and Patrick K. and Shelly R. Worrell regarding their respective positions on this request.

WHEREFORE, Chevron respectfully requests that the Division enter an order granting the withdrawal of Chevron's Case Nos. 21041 – 21045.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on April 22, 2020.

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