

**Davidson, Florene, EMNRD**

**From:** Ernest Padilla <epadillapl@qwestoffice.net>  
**Sent:** Friday, January 03, 2014 4:46 PM  
**To:** Davidson, Florene, EMNRD  
**Cc:** Michael Feldewert  
**Subject:** FW: Notice of Pooling Application for Chevron Bell Lake 18-23-34 1H Well

RECEIVED OCD  
2014 JAN -6 A 7:56

Ms. Davidson:

Please forward this email to Ms. Bailey. I meant to copy her in the attached email. Let me know if you have any questions.

Ernest L. Padilla  
PADILLA LAW FIRM, P.A.  
P.O. Box 2523  
Santa Fe, New Mexico 87504-2523  
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F: 505-988-7592  
E: [epadillapl@qwestoffice.net](mailto:epadillapl@qwestoffice.net); (office) [padillalaw@qwestoffice.net](mailto:padillalaw@qwestoffice.net)

Case 15074

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**From:** Ernest Padilla [<mailto:epadillapl@qwestoffice.net>]  
**Sent:** Friday, January 03, 2014 4:41 PM  
**To:** 'Michael Feldewert'  
**Cc:** [don@enduranceresourcesllc.com](mailto:don@enduranceresourcesllc.com); Manny Sirgo ([manny@enduranceresourcesllc.com](mailto:manny@enduranceresourcesllc.com)); [Jason@enduranceresourcesllc.com](mailto:Jason@enduranceresourcesllc.com)  
**Subject:** RE: Notice of Pooling Application for Chevron Bell Lake 18-23-34 1H Well

Mike:

Thanks for sending me a copy of the notices and application. Am I correct that the copies are courtesy copies? I have not entered an appearance in the case so the notices should properly have been sent to my clients. The application does not have a case number.

My involvement to date has been to protest the drilling application.

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**From:** Michael Feldewert [<mailto:MFeldewert@hollandhart.com>]  
**Sent:** Friday, January 03, 2014 3:27 PM  
**To:** Ernest Padilla  
**Cc:** Bosell, Benjamin L  
**Subject:** Notice of Pooling Application for Chevron Bell Lake 18-23-34 1H Well

Ernie: I am providing you with a copy of these notice letters as the attorney for the objecting parties.

**Michael H. Feldewert**

*Partner*

Holland & Hart, LLP

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

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**HOLLAND & HART** 

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2014 JAN -6 A 7:53

January 3, 2014

VIA EMAIL

Jami Bailey, Division Director  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Case 15074

**Re: Chevron U.S.A. Inc.  
Bell Lake 18-23-34 #1H ("Bell Lake")  
S/2N/2 of Section 18, T23S, R34E, NMPM, Lea County, New Mexico**

Dear Ms. Bailey:

BTA Oil Producers, LLC, leasehold interest owner in the entire S/2 of Section 18, have asked us to formally protest the drilling of the above-referenced well proposed by Chevron U.S.A. Inc. dedicated to an east/west non-standard spacing unit.

BTA's reasons for opposing the well are the same as expressed in our letters of December 27 and 31, 2013, to you on behalf of Endurance Resources LLC. In short, BTA, like Randall Harris and Ray Westall, is strongly opposed to an east/west oriented well, and is ready to participate in the north/south oriented well proposed by Endurance Resources.

Accordingly, BTA joins in the request that the Oil Conservation Division order Chevron to suspend any drilling of its proposed well until all parties can be heard at hearing to determine which of the opposing proposals should be adopted in the best interests of conservation of oil and gas resources underlying Section 18.

Thank you for your prompt attention to this matter.

Very truly yours,

*Ernest L. Padilla*

ERNEST L. PADILLA

ELP:jbg

c: BTA Oil Producers, LLC  
Endurance Resources, LLC

PADILLA LAW FIRM, P.A.

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OCD

2014 JAN -3 A 7:53

December 27, 2013

VIA EMAIL

Jami Bailey, Division Director  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Case 15074

**Re: Chevron U.S.A. Inc.  
Bell Lake 18-23-34 #1H ("Bell Lake")  
S/2N/2 of Section 18, T23S, R34E, NMPM, Lea County, New Mexico**

Dear Ms. Bailey:

Randall Harris and Ray Westall, leasehold interest owners in the N/2 of Section 18, have asked us to formally protest the drilling of the above-referenced well proposed by Chevron U.S.A. Inc.

Their reasons for opposing the well are the same as expressed in our letters of December 27 and 31, 2013, to you on behalf of Endurance Resources LLC. In short, they are strongly opposed to an east/west oriented well, and are poised to participate in the north/south oriented well proposed by Endurance Resource.

Accordingly, they join in the request that the Oil Conservation Division order Chevron to suspend any drilling of its proposed well until all parties can be heard at hearing to determine which of the opposing proposals should be adopted in the best interests of conservation of oil and gas resources underlying Section 18.

Thank you for your prompt attention to this matter.

Very truly yours,

ERNEST L. PADILLA

ELP:jbg

c: Ray Westall  
Randall Harris  
Endurance Resources, LLC