

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

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**APPLICATION OF CHEVRON U.S.A., INC.  
FOR A NON-STANDARD SPACING AND  
PRORATION UNIT, AND COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.**

**Case No. 15269**

**RESPONDENT'S PRE-HEARING STATEMENT**

Respondent Trabajo Del Spear, LP submits this pre-hearing statement for the referenced case pursuant to the Rules of the Oil Conservation Division:

**APPEARANCES**

**RESPONDENT**

Trabajo Del Spear, LP  
P.O. Box 1684  
Midland, TX 79702

**RESPONDENT'S ATTORNEY**

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**RESPONDENT'S STATEMENT OF THE CASE**

Chevron U.S.A. Inc has brought this action to obtain approval for a non-standard spacing and proration unit, and to compulsorily pool non-participating working interest owners, regarding the White City 21 25 27 Fed. Com. No. 5H Well. Respondent Trabajo Del Spear, LP is an affected working interest owner. Respondent has elected to participate, but has not yet had an opportunity to pay its share of drilling costs or review and evaluate the Joint Operating Agreement proposed by Chevron in connection with such participation. Respondent reasonably believes there may be issues to be raised and addressed in connection with the proposed JOA.

**RESPONDENT'S PROPOSED EVIDENCE**

<b>WITNESS</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Those witnesses called by Chevron.	10 minutes	Approx. 2

**PROCEDURAL MATTERS**

None at this time.

**RESPONDENT'S POSITION ON RELIEF SOUGHT**

Respondent opposes the issuance of the compulsory pooling relief sought by Chevron until such time as it has had adequate opportunity to review, evaluate and address issues raised by the proposed JOA.

RESPECTFULLY SUBMITTED,

CAVIN & INGRAM, P.A.

By: 

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ATTORNEY FOR TRABAJO DEL SPEAR, LP

I hereby certify that a true and correct copy of the foregoing was served via U.S. mail and e-mail on February 26, 2015 to the following:

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By:   
Stephen D. Ingram