

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

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF CHESAPEAKE OPERATING, INC.,                      CASE NO. 14023  
FOR RESCISSION OF THE SPECIAL RULES AND  
REGULATIONS FOR THE TV PENNSYLVANIAN  
GAS POOL, CHAVES COUNTY, NEW MEXICO.

PRE- HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Jim Ball  
Chesapeake Operating Inc.  
6100 Western Ave.  
Oklahoma City, OK 73148  
(405) 879-9189

ATTORNEY

Ocean Munds-Dry, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

STATEMENT OF CASE

APPLICANT

Applicant seeks rescission of the Special Rules and Regulations for the TV Pennsylvanian Gas Pool to permit the pool to be developed under the current General Rule 104.C (2) for deep gas that provides for 320 acre spacing units with wells located no closer than 660 feet from the outer boundary of the quarter section on which the well is located and no closer than 10 feet to any quarter section line or subdivision inner boundary. The TV Pennsylvanian Gas Pool includes the following acreage in Chaves County, New Mexico: the N/2 of Section 22 and the W/2 of Section 23, Township 11 South, Range 31 East, NMPM. Said pool is located approximately 7 miles southwest of the Village Caprock, New Mexico.

**PROPOSED EVIDENCE**

<u>WITNESSES</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Jim Ball Petroleum Landman	15 Minutes	5
David Godsey Petroleum Geologist	20 Minutes	5

**PROCEDURAL MATTERS**

Chesapeake Operating Inc., has none at this time.

Respectfully submitted,

HOLLAND & HART LLP

By: Ocean Munds-Dry

William F. Carr

Ocean Munds-Dry

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043 Facsimile

**ATTORNEYS FOR  
CHESAPEAKE OPERATING INC.**