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

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

**CASE NO. 16405** 

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

This pre-hearing statement is submitted by Chevron USA Inc. ("Chevron") as required by the Oil Conservation Division.

#### **APPEARANCES**

## **APPLICANT**

## **ATTORNEY**

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#### STATEMENT OF THE CASE

Chevron seeks an order (1) creating, if necessary, a non-standard 640-acre spacing unit comprised of the E/2 of Section 3 and the E/2 of Section 10, Township 23 South, Range 28 East, N.M.P.M., Eddy County, New Mexico; and (2) pooling all mineral interests in the Wolfcamp formation underlying this acreage. Chevron proposes to dedicate the above-referenced spacing

and proration unit as the project area for three proposed wells: the proposed CB Hays 10 3 Fed Com 005 1H Well, the proposed CB Hays 10 3 Fed Com 005 2H Well, and the proposed CB Hays 10 3 Fed Com 005 3H Well, which will be simultaneously drilled and completed. The three proposed horizontal wells will be pad drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 15 to bottom hole locations in the NW/4 NE/4 (Unit B) of Section 3 for the CB Hays 10 3 Fed Com 005 1H Well and in the NE/4 NE/4 (Unit A) of Section 3 for the CB Hays 10 3 Fed Com 005 2H Well and the CB Hays 10 3 Fed Com 005 3H Well. The completed interval for each well will remain within the 330-foot offset required by the Special Rules for the Purple Sage Wolfcamp Gas Pool (Pool Code 98220).

## APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Irvin Gutierrez Landman	Approx. 10 minutes	Approx 5.
Rachel Storniolo Geologist	Approx. 10 minutes	Approx 4.

# PROCEDURAL MATTERS

At hearing, Chevron will dismiss the portion of the application requesting a non-standard spacing unit.

# Respectfully submitted,

# HOLLAND & HART LLP

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