

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

**APPLICATION OF CHEVRON USA, INC.
FOR APPROVAL OF THE JAVELINA
UNIT AND SURFACE COMMINGLING,
EDDY COUNTY NEW MEXICO.**

CASE NO. 16436

CHEVRON U.S.A. INC'S PRE-HEARING STATEMENT

Chevron U.S.A. Inc. ("Chevron") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Chevron U.S.A. Inc.

ATTORNEY

Jennifer L. Bradfute
Deana Bennett
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

INTERESTED PARTIES

Douglas McLeod, and Petrogulf Corporation

Titus Oil & Gas, LLC

ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

STATEMENT OF CASE

APPLICANT:

Applicant seeks approval of its Javelina Unit consisting of approximately 5,119.76 acres of state and federal lands situated in all of Sections 1, 2, 9, 10, 11, 12, 15 and 16 of Township 24 South, Range 31 East, N.M.P.M., Eddy County, New Mexico. The unitized interval includes all oil and gas in any and all formations of the unitized land from the top of the Bone Spring formation defined as the stratigraphic equivalent of the top of the Bone Spring Lime, as seen at 8,400 feet beneath the surface in that certain Schlumberger Gamma Ray and Dual Laterolog/MSFL, dated November 13, 1980, in the Sotol Federal 1 (API # 30-015-23459), located in Section 12, Township 24 South, Range 31 East, Eddy County, New Mexico, to the center of the earth. In addition, Applicant seeks approval to surface commingle production from the Bone Spring and Wolfcamp formations underlying the unit.


PROPOSED EVIDENCE

APPLICANT:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Christopher Cooper – Landman	Approx. 15	Approx. 6
Frederick Verner – Geologist	Approx. 20	Approx. 10
Juan Acevedo – Engineer	Approx. 20	

Respectfully submitted,

**MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.**

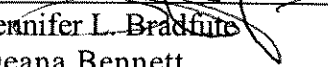
By: 
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on September 27, 2018:

James Bruce
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Santa Fe, New Mexico 87504
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By: _____


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