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

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NOS. 20815 AND 20816

CHEVRON'S CONSOLIDATED PRE-HEARING STATEMENT

Chevron U.S.A., Inc. ("Chevron") (OGRID No. 215099) submits this Consolidated Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLI	CANT	

ATTORNEY

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INTERESTED PARTIES

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STATEMENT OF THE CASE

In Case No. 20815, Novo seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 W/2 of Sections 10 and 15, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico dedicated to the following proposed wells:

• The Saturninus Fed Corn 1510 #11111 Well, the Saturninus Fed Com 1510 #121H Well; and the Saturninus Fed Corn 1510 #13111 Well, each of which will be horizontally drilled from a common surface location in the SW/4 SW/4 (Unit M) of Section 15 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 10.

In Case No. **20816**, Novo seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of Sections 10 and 15, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico dedicated to the following proposed wells:

• The Saturninus Fed Corn 1510 #112H Well, the Saturninus Fed Corn 1510 #122H Well, and the Saturninus Fed Corn 1510 #132H Well, each of which will be horizontally drilled from a common surface location in the SW/4 SW/4 (Unit M) of Section 15 to bottom hole locations in the NE/4 NW/4 (Unit C) of Section 10.

Chevron is an interested party provided with notice of the applications.

PROPOSED EVIDENCE

No witnesses or exhibits are anticipated to be presented.

PROCEDURAL MATTERS

Chevron understands that Titus Oil & Gas LLC is seeking to continue the hearing to the January 23, 2020 Examiner docket or a November 14, 2019 special hearing docket. Chevron opposes the request for continuance.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS

& SISK-R.A

By:

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on September 26, 2019:

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