

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

**APPLICATIONS OF CHEVRON U.S.A.  
INC. FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NOS. 21294, 21295**

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

This consolidated pre-hearing statement is submitted by Chevron U.S.A. Inc. ("Chevron")  
as required by the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

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**ATTORNEY**

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**STATEMENT OF THE CASE**

In **Case No. 21294**, Chevron seeks an order pooling all uncommitted interests in the Bone Spring formation (Culebra Bluff; Bone Spring, South Pool [15011]) underlying a standard 240-acre horizontal spacing unit comprised of the W/2 E/2 of Section 23 and the W/2 SE/4 of Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Chevron proposes to dedicate the above-referenced spacing unit to the initial **CB BERU 23 14 FEE 06 #301H Well**

(API No. 30-015-46926), to be horizontally drilled from surface hole locations in the SE/4 SE/4 (Unit P) of Section 23 to bottom hole locations in the SW/4 NE/4 (Unit G) of Section 14. The completed interval of this well will comply with statewide setbacks for oil wells.

In **Case No. 21295**, Chevron seeks an order pooling all uncommitted interests in the Bone Spring formation (Culebra Bluff; Bone Spring, South Pool [15011]) underlying a standard 240-acre horizontal spacing unit comprised of the E/2 E/2 of Section 23 and the E/2 SE/4 of Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Chevron proposes to dedicate the above-referenced spacing unit to the proposed initial **CB BERU 23 14 FEE 06 #302H Well (API No. 30-015-46927)**, to be horizontally drilled from surface hole locations in the SE/4 SE/4 (Unit P) of Section 23 to bottom hole locations in the SE/4 NE/4 (Unit H) of Section 14. The completed interval for this well will comply with statewide setbacks for oil wells.

#### **APPLICANT'S PROPOSED EVIDENCE**

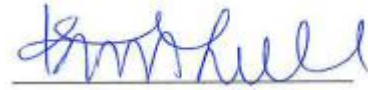
| <b>WITNESS<br/>Name and Expertise</b> | <b>ESTIMATED TIME</b> | <b>EXHIBITS</b> |
|---------------------------------------|-----------------------|-----------------|
| Kelly Rau, Landman                    | Affidavit             | Approx. 5       |
| Karl Bloor, Geologist                 | Affidavit             | Approx. 4       |

#### **PROCEDURAL MATTERS**

Chevron intends to present these cases by affidavits if uncontested at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



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