

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

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

**CASE NOS. 21296**

**CHEVRON'S PRE-HEARING STATEMENT**

This 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**

Chevron seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool [98220]) underlying a standard 480-acre horizontal spacing unit comprised of the E/2 of Section 23 and the 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 following initial wells:

(1) The **CB BERU 23 14 FEE 06 #401H Well (API No. 30-015-46928)** to be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 23 to a bottom hole location in the SW/4 NE/4 (Unit G) of Section 14; and (2) The **CB BERU 23 14 FEE 06 #402H Well (API No. 30-015-46929)** and (3) the **CB BERU 23 14 FEE 06 #403H Well (API No. 30-015-46930)**, both are 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.

Pursuant to the Special Rules for the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220), the completed interval for each of these proposed initial wells will comply with the 330-foot setback requirement.

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

<b>WITNESS 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 this case by affidavits if uncontested at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



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