

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF CHEVRON U.S.A. INC. FOR
AN OVERLAPPING SPACING UNIT IN THE
BONE SPRING FORMATION AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

Case No. 21499

**APPLICATION OF CHEVRON U.S.A. INC. FOR
AN OVERLAPPING SPACING UNIT IN THE
WOLFCAMP FORMATION AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

Case No. 21500

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Mewbourne Oil Company ("Mewbourne") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Chevron U.S.A. Inc.

APPLICANT'S ATTORNEY

Holland & Hart LLP

OPPONENTS

Mewbourne Oil Company

OPPONENTS' ATTORNEYS

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
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STATEMENT OF THE CASE

In Case Nos. 21499 and 21500 Chevron U.S.A. Inc. ("Chevron") seeks orders pooling well units in the Bone Spring and Wolfcamp formations in the E/2 of Section 26 and the E/2 of Section 35, Township 23 South, Range 28 East, N.M.P.M.

Mewbourne, as operator under a JOA covering all of Section 35, Township 23 South, Range 28 East, N.M.P.M., submitted well proposals to working interest owners for competing wells in the E/2 of Section 35. Chevron has elected to join in these wells.

Chevron's applications should be denied because there is a voluntary agreement covering the E/2 of Section 35..

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Mewbourne

Cy Shook
(landman)

20 min.

Approx. 8

Tyler Hill
(geologist)

15 min.

Approx. 6

Travis Cude
(engineer)

25 min.

Approx. 6

PROCEDURAL MATTERS

Mewbourne objects to presentation of Chevron's cases by affidavit. Either the cases should be continued, or there should be a status conference only on these cases.

Mewbourne may also file a motion to dismiss.

Respectfully submitted,



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jamesbruc@aol.com

Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

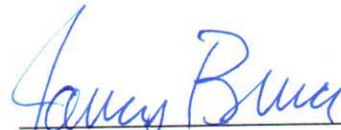
I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 28th day of October, 2020 by e-mail:

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