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

APPLICATION OF CHEVRON U.S.A. INC. FOR A NON-STANDARD SPACING AND PRORATION UNIT, AND COMPULSORY POOLING. LEA COUNTY, NEW MEXICO.

**CASE NO. 15160** 

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

This pre-hearing statement is submitted by Chevron U.S.A. Inc. ("Chevron") as required

by the Oil Conservation Division.

#### **APPEARANCES**

APPLICANT

**ATTORNEY** 

Chevron U.S.A. Inc. 1400 Smith Street Houston, Texas 77002

JUN 19 A II: 3 Michael H. Feldewert Adam G. Rankin Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile

### STATEMENT OF THE CASE

Chevron seeks an order (1) creating a 160-acre spacing and proration unit comprised of the W/2W/2 of Section 14. Township 24 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all mineral interests in the Bone Spring formation underlying this acreage. This non-standard spacing and proration unit will be the project area for the proposed Gramma Ridge 14-24-34-2H Well, which will be horizontally drilled from a surface location in the NW/4NW/4 (Unit D) to a standard bottom hole location in SW/4SW/4 (Unit M) of Section 14. The completed interval for this well will remain within the 330-foot standard offset required by Division rules.

## APPLICANT'S PROPOSED EVIDENCE

| WITNESS Name and Expertise      | ESTIMATED TIME   | EXHIBITS   |
|---------------------------------|------------------|------------|
| Cody Cole<br>Petroleum Landman  | Approx. 10 mins. | Approx. 5. |
| Fred Verner Petroleum Geologist | Approx. 10 mins. | Approx 5.  |

## PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP

Michael H. Feldewert Adam G. Rankin Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

ATTORNEYS FOR CHEVRON U.S.A. INC.