

**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,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 15269**

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

**CASE NO. 15270**

**CHEVRON'S CONSOLIDATED 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**

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

**ATTORNEY**

Michael H. Feldewert  
Jordan L. Kessler  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
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**STATEMENT OF THE CASE**

In Case No. 15269, Chevron seeks an order (1) creating a 160-acre spacing and proration unit comprised of the W/2 W/2 of Section 21, Township 25 South, Range 27 East, N.M.P.M., Eddy 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 **White City 21 25 27 Fed Com No. 5H Well**, which will be horizontally drilled from a surface location in the SW/4SW/4 (Unit M) to a bottom hole location in NW/4NW/4 (Unit D) of Section 21. The completed interval for this well will remain within the 330-foot standard offset required by the Statewide Rules set forth in 19.15.15 NMAC.

In Case No. 15270, Chevron seeks an order (1) creating a 160-acre spacing and proration unit comprised of the E/2 W/2 of Section 21, Township 25 South, Range 27 East, N.M.P.M., Eddy 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 projected area for the proposed **White City 21 25 27 Fed Com No. 6H Well**, which will be horizontally drilled from a surface location in the SE/4SW/4 (Unit N) to a bottom hole location in NE/4NW/4 (Unit C) of Section 21. The completed interval for this well will remain within the 330-foot standard offset required by the Statewide Rules set forth in 19.15.15 NMAC.

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

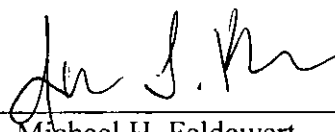
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
India Isbell Petroleum Landman	Approx. 15 minutes	Approx. 10.
Ken Schwartz Petroleum Geologist	Approx. 15 minutes	Approx 8.

**PROCEDURAL MATTERS**

Chevron requests that Case Nos. 15269 and 15270 be consolidated for purposes of hearing efficiency.

Respectfully submitted,

HOLLAND & HART, LLP

A handwritten signature in black ink, appearing to read "Michael H. Feldewert", is written over a horizontal line.

Michael H. Feldewert

Jordan L. Kessler

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**ATTORNEYS FOR CHEVRON U.S.A. INC.**

# CAVIN & INGRAM, P.A.

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## FAX FILING COVER PAGE

TO: New Mexico Oil Conservation Division  
(505) 476-3462

FROM: Stephen D. Ingram

DATE: February 26, 2015

RE: OCD File No. 15269

MESSAGE: Enclosed is an Entry of Appearance and Pre-Hearing Statement to be filed in this matter on behalf of Trabajo Del Spear, LP.

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**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
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**APPLICATION OF CHEVRON U.S.A., INC.  
FOR A NON-STANDARD SPACING AND  
PRORATION UNIT, AND COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.**

Case No. 15269

**ENTRY OF APPEARANCE**

COMES NOW Trabajo Del Spear, LP, by and through their undersigned attorneys, Cavin & Ingram, P.A. (Stephen D. Ingram), and hereby enter their appearance in the above-referenced matter.

RESPECTFULLY SUBMITTED,

CAVIN & INGRAM, P.A.

By: 

Stephen D. Ingram

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ATTORNEY FOR TRABAJO DEL SPEAR, LP

I hereby certify that a true and correct copy of the foregoing was served via U.S. mail and e-mail on February 26, 2015 to the following:

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By: 

Stephen D. Ingram

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