

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

**APPLICATION OF CHEVRON MIDCONTINENT, L.P.  
TO AMEND ORDER R-13949 TO APPROVE A 120-ACRE  
NON-STANDARD SPACING UNIT AND NON-STANDARD  
PROJECT AREA, LEA COUNTY, NEW MEXICO.**

**CASE NO. 15236 (re-opened)**

**CHEVRON'S PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Chevron Midcontinent, L.P. ("Chevron") as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Chevron Midcontinent, L.P.  
1400 Smith Street  
Houston, Texas 77002

**ATTORNEY**

Michael H. Feldewert  
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**STATEMENT OF THE CASE**

Chevron seeks to amend Division Order R-13949 to approve a 120-acre non-standard spacing and proration unit and non-standard project area comprised of the SW/4 NW/4 and the W/2 SW/4 of Section 11, Township 24 South, Range 34 East, N.M.P.M., Lea County, New Mexico. Order R-13949, entered on January 20, 2015, approved within the Bone Spring formation a non-standard spacing and proration unit comprised of the W/2 W/2 of Section 11, Township 24 South, Range 34 East, pooled the uncommitted interests within this unit, and

dedicated this acreage to Chevron's Antelope Ridge 11-24-34 Federal Well No. 3H (30-025-42318). Chevron commenced drilling this well pursuant to the Division's order but encountered unanticipated drilling problems, which required Chevron to place the bottom hole location 1274 feet from the North line and 991 feet from the West line. This prevented Chevron from completing the well in the NW/4 NW/4 (Unit D) of Section 11.

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

| <b>WITNESS<br/>Name and Expertise</b> | <b>ESTIMATED TIME</b> | <b>EXHIBITS</b> |
|---------------------------------------|-----------------------|-----------------|
| Chidubem Allinor<br>Drilling Engineer | Approx. 10 minutes    | Approx 1.       |

#### **PROCEDURAL MATTERS**

This case will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART, LLP



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