# 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. 16133

# PRE-HEARING STATEMENT OF CHEVRON U.S.A. INC.

Chevron U.S.A. Inc. ("Chevron") submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

#### **APPEARANCES**

Phone: (505) 988-7577

epadillaplf@qwestoffice.net

| PARTIES                       | <b>ATTORNEYS</b>   |
|-------------------------------|--|
| Applicant Chevron U.S.A. Inc. | Gary W. Larson Hinkle Shanor LLP P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 glarson@hinklelawfirm.com |
| Tap Rock Resources, LLC       | James Bruce Post Office Box 1056 Santa Fe, NM 87504 Phone: (505) 982-2043 jamesbruc@aol.com                            |
| EOG Resources, Inc.           | Ernest Padilla<br>Padilla Law Firm, PA<br>1512 St. Francis Drive<br>Santa Fe, NM 87505                                 |

Douglas McLeod

Earl E. DeBrine, Jr.
Jennifer Bradfute
Modrall Sperling Roehl Harris & Sisk PA
Post Office Box 2168
Albuquerque, NM 87103-2168
Phone: (505) 848-1800
edebrine@modrall.com
iennifer.bradfute@modrall.com

#### STATEMENT OF THE CASE

Chevron's application seeks an order (i) approving a 480-acre, non-standard spacing and proration unit in the E/2 of Section 14 and the SE/4 of Section 11, Township 24 South, Range 31 East in Eddy County, and (ii) pooling all uncommitted mineral interests in the Wolfcamp formation underlying this acreage. Chevron proposes to dedicate the non-standard spacing and proration unit as the project area for the following three (3) wells:

- 1. The SND 11 14 Fed Com 004 #4H well, which will be horizontally drilled from a surface location in Unit H in Section 11 to a bottom hole location in Unit O in Section 14;
- 2. The SND 11 14 Fed Com 004 #5H well, which will be horizontally drilled from a surface located in Unit H in Section 11 to a bottom hole location in Unit P in Section 14; and
- 3. The SND 11 14 Fed Com 004 #6H well, which will be horizontally drilled from a surface location in Unit H in Section 11 to a bottom hole location in Unit P in Section 14.

The completed interval for all of the wells will be orthodox.

### PROPOSED EVIDENCE

| WITNESS                    | ESTIMATED TIME | <b>EXHIBITS</b> |
|----------------------------|----------------|-----------------|
| Chris Cooper<br>(Landman)  | 15 minutes     | Approx. 8       |
| Tim O'Toole<br>(Geologist) | 15 minutes     | Approx. 5       |
| Sean Cheben<br>(Engineer)  | 15 minutes     | Approx. 2       |

Chevron reserves the right to call a rebuttal witness(es) if appropriate.

#### PROCEDURAL MATTERS

Because this case involves the same acreage and the same Chevron witnesses as Case No.

16132, Chevron requests that Case Nos. 16132 and 16133 be consolidated for hearing.

HINKLE SHANOR LLP

Gary W. Larson P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554 Facsimile: (505) 982-8623 glarson@hinklelawfirm.com

Counsel for Chevron U.S.A. Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of May, 2018 I served a true and correct copy of the foregoing *Pre-Hearing Statement of Chevron U.S.A. Inc.* via email to:

James Bruce Post Office Box 1056 Santa Fe, NM 87504 505-982-2043 jamesbruc@aol.com

Counsel for Tap Rock Resources, LLC

Ernest Padilla
Padilla Law Firm, PA
1512 St. Francis Drive
Santa Fe, NM 87505
505-988-7577
epadillaplf@qwestoffice.net

Counsel for EOG Resources, Inc.

Earl E. DeBrine, Jr.
Jennifer L. Bradfute
Modrall Sperling Roehl Harris & Sisk PA
Post Office Box 2168
Albuquerque, NM 87103-2168
505-848-1800
edebrine@modrall.com
jennifer.bradfute@modrall.com

Counsel for Douglas McLeod

Gary W. Larson