

**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:**

CASE NO. 14114

**APPLICATION OF CHEVRON USA, INC. FOR
AMENDMENT OF DIVISION ORDER NO. R-4442,
AS AMENDED, TO AUTHORIZE A VERTICAL
EXPANSION OF THE VACUUM GRAYBURG-
SAN ANDRES UNIT AND ADDITION OF
NEW WELLS FOR INJECTION OF
CARBON DIOXIDE, LEA COUNTY, NEW MEXICO.**

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PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Chevron USA Inc.
Attn: Daniel Pequeno
15 Smith Road, RM-2235
Midland, Texas 79707
(432) 687-7461

ATTORNEY

William F. Carr
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

STATEMENT OF CASE

APPLICANT

Chevron USA, Inc. seeks approval of a vertical expansion of the unitized formation in its Vacuum Grayburg-San Andres Unit and to place additional wells on injection. Chevron proposes to inject carbon dioxide into the Grayburg and San Andres formation from a proposed depth of 3902 feet to 5020 feet in Sections 1 and 2 of Township 18 South, Range 34 East, NMPM. Applicant seeks to inject at a maximum rate of 1850 psi.

PROPOSED EVIDENCE

APPLICANT

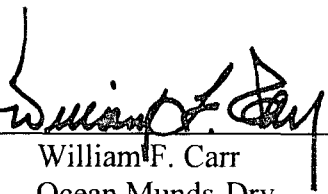
WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Daniel Pequeno Petroleum Landman	15 Minutes	Approximately 7
Scott M. Ingram Reservoir Engineer	25 Minutes	Approximately 7

PROCEDURAL MATTERS

Chevron USA, Inc. has none at this time.

Respectfully submitted,

HOLLAND & HART LLP

By: 
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Ocean Munds-Dry

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**ATTORNEYS FOR
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