

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

**CASE NO. 13006**

**APPLICATION OF CHESAPEAKE OPERATING INC.  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by CHESAPEAKE OPERATING INC. as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

**APPLICANT**

Chesapeake Operating Inc.  
P. O. Box 18496  
Oklahoma City, OK 73154  
(405) 848-8000  
attn: Lynda Townsend

**ATTORNEY**

W. Thomas Kellahin  
KELLAHIN & KELLAHIN  
P.O. Box 2265  
Santa Fe, NM 87504  
(505) 982-4285

**STATEMENT OF THE CASE**

1. Chesapeake has the right to drill and develop the oil and gas minerals from the surface to the base of the Mississippian formation underlying the W/2 of Section 33, T14S, R35E, NMPM, Lea County, New Mexico.

2. Chesapeake has proposed this well and its appropriate spacing unit to the working interest and unleased mineral interest owners in the spacing unit.

3. Despite its good faith effort, Chesapeake has been unable to obtain a voluntary agreement with all of the interests owners.

4. Pursuant to Section 70-2-17.C NMSA (1978) and in order to obtain its just and equitable share of potential production underlying the various spacing units, the applicant needs an order of the Division pooling the identified and described mineral interests involved in order to protect correlative rights and prevent waste.

### PROPOSED EVIDENCE

#### APPLICANT:

#### WITNESSES

#### EST. TIME EXHIBITS

Lynda Townsend (landman)

20 min.

@ 4 exhibits

Robert Hefner (geology)

20 Min.

@ 3 exhibits

### PROCEDURAL MATTERS

KELLAHIN AND KELLAHIN

By: 

W. Thomas Kellahin