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

APPLICATION OF CHISHOLM ENERGY OPERATING, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 16396

CHISHOLM ENERGY OPERATING, LLC'S PRE-HEARING STATEMENT

Chisholm Energy Operating, LLC ("Chisholm") (OGRID No. 327137) submits this

Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

Chisholm Energy Operating LLC

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OTHER APPEARANCES

ATTORNEYS

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APPLICANT'S STATEMENT OF CASE

Since the amendments to the Horizontal Well rules remain effective, Chisholm hereby dismisses the portion of the application seeking to create a non-standard spacing and proration unit. Chisholm seeks an Order pooling all uncommitted interests in the Bone Spring formation underlying a 320-acre, more or less, <u>standard</u> spacing and proration unit comprised of the E/2 E/2 of Section 32, Township 22 South, Range 26 East, NMPM, and Lot 1, SE/4 NE/4, E/2 SE/4 [E/2 E/2 equivalent of Section 5, Township 23 South, Range 26 East, NMPM, Eddy County, New Mexico. This standard spacing and proration unit will be dedicated to applicant's proposed **Bodacious 5-32 Fed Com 3BS No. 4H Well**, which will be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 5 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 32. The completed interval for this well will remain within the standard offset required by the statewide rules.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Davis Armour – Landman	Approx. 10	Approx. 5
Josh Kuhn – Geologist	Approx. 10	Approx. 4
PROCEDURAL MATTERS		

Since all the interest owners in the subject acreage have been contacted and do no oppose this pooling application, Chisholm intends to present this case by affidavits.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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