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

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

CASE NO. 15868

PRE-HEARING STATEMENT

Great Western Drilling Ltd. and Great Western Drilling Company ("Great Western"),

provisionally provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

GREAT WESTERN DRILLING LTD. AND GREAT WESTERN DRILLING COMPANY

<u>GREAT WESTERN DRILLING LTD.</u> <u>AND GREAT WESTERN DRILLING</u> <u>COMPANY 'S ATTORNEY</u>

J. Scott Hall, Esq. MONTGOMERY & ANDREWS, P.A. P.O. Box 2307 Santa Fe, NM 87504-2307 Tele (505) 982-3873 shall@montand.com

<u>APPLICANT</u>

CHISOLM ENERGY OPERATING, LLC

APPLICANT'S ATTORNEY

Michael H. Feldewert Jordan L. Kessler Holland & Hart, LLP Post Office Box 2208 Santa Fe, NM 87504-2208 <u>mfeldewert@hollandhart.com</u> <u>jlkessler@hollandhart.com</u>

STATEMENT OF THE CASE

Applicant Chisolm Energy Operating, LLC seeks an order (1) creating a non-standard 160-acre, more or less, spacing and proration unit comprised of the E/2 E/2 of Section 34, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Bone Spring formation underlying this acreage.

Great Western has made countervailing development proposals to Chisolm and other interest owners. Great Western also proposes to operate its wells on the proposed non-standard units. Great Western therefore opposes Chisolm Energy's Application.

PROPOSED EVIDENCE

<u>OPPONENT</u> : GREAT WESTERN DRILLING LTD. AND GREAT WESTERN DRILLING COMPANY	<u>EST. TIME</u>	<u>EXHIBITS</u>
WITNESSES:		
Carter Muire or Tom Magee, Land	15 minutes	6
Russell Rich or Terry Worthington, Geo	20 minutes	6
APPLICANT: CHISOLM ENERGY OPERATING, LLC	<u>EST. TIME</u>	EXHIBITS
<u>WITNESSES</u> :		

PROCEDURAL MATTERS

Great Western is requesting that the hearing in this matter be continued to the November 30, 2017 Examiner hearing docket.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

Tall con By:_

J. Scott Hall Seth C. McMillan Post Office Box 2307 Santa Fe, New Mexico 87504-2307 (505) 982-3873 <u>shall@montand.com</u> smcmillan@montand.com

Attorneys for Great Western Drilling Ltd. and Great Western Drilling Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on October 19, 2017:

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J. Scott Hall