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

APPLICATION OF CHISHOLM ENERGY OPERATING, LLC FOR COMPULSORY POOLING LEA COUNTY, NEW MEXICO.

CASE NO. 22175

SECOND AFFIDAVIT OF JOSH KUHN, GEOLOGIST

Josh Kuhn, of lawful age and being first duly sworn, declares as follows:

1. My name is Josh Kuhn. I work for Chisholm Energy Operating, LLC ("Chisholm") as a Geologist.

2. In this case, Chisholm is targeting the First Bone Spring interval of the Bone Spring formation because a depth severance exists in the acreage included in this spacing unit.

3. As reflected in paragraph 11 of Chisholm's Exhibit C and Exhibit C-2, Chisholm is currently in a voluntary agreement with the only vertical offset party within the Bone Spring formation who is not subject to this pooling application—OXY USA Inc. OXY's interest differs only slightly above and below the depth severance.

4. **Chisholm Exhibit G-1** is a map of the spacing unit, a gun-barrel, and a type log for the targeted interval of the Bone Spring formation underlying this spacing unit. The location of the type log is noted on the map with a star. The targeted interval for the well is labeled and depicted with a green bubble, and the Second Bone Spring interval is marked with a red bubble. The exhibit illustrates the existing Second Bone Spring Sandstone well (Chisholm's Buffalo West 2 State Com 2BS 5H well) and the planned Ram 2-11 Fed 1BS Com #10H well in this case.

5. As shown on the type log on the right side of the exhibit, there is just over 300 feet of separation between the First and Second Bone Spring intervals underlying this spacing unit. The

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. G
Submitted by: Chisholm Energy Operating, LLC
Hearing Date: October 7, 2021
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Received by OCD: 10/12/2021 1:52:03 PM

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cleaner gamma ray, and high resistivity demonstrate a tight, low-permeability carbonate fracture

barrier between the First and Second Bone Spring intervals. Due to the existence of more than 300

vertical feet of offset and a frac barrier between the intervals, I do not expect communication or

impairment to the lower intervals of the Bone Spring formation from the development of the

proposed initial well in the First Bone Spring in this case.

6. It is my opinion that the development of the First Bone Spring formation by

Chisholm in this case is in the best interest of conservation, the prevention of waste, and protection

of correlative rights.

7. **Chisholm Exhibit G-1** was either prepared by me or compiled under my direction

and supervision.

FURTHER AFFIANT SAYETH NOT.

JOSH KUHN

STATE OF TEXAS

COUNTY OF TARRANT

SUBSCRIBED and SWORN to before me this ______ day of October 2021 by Josh

Kuhn.

My Commission Expires:

