

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

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

**CASE NOS. 21821, 21822**

**CHISHOLM ENERGY OPERATING, LLC'S  
CONSOLIDATED PRE-HEARING STATEMENT**

Chisholm Energy Operating, LLC ("Chisholm") (OGRID No. 327137), the applicant submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Chisholm Energy Operating, LLC

**ATTORNEY**

Michael H. Feldewert  
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Kaitlyn A. Luck  
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**OTHER PARTY**

None

**ATTORNEY**

**APPLICANT’S STATEMENT OF THE CASES**

In Case No. 21821, Chisholm seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a standard 143.56-acre, more or less, horizontal spacing unit comprised of the W/2 W/2 of Section 18, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to the **Sombrero 18 Fed 3BS Com #1H well** to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 7 to a bottom hole location in the SW/4 SW/4 (Lot 4) of Section 18.

In Case No. 21822, Chisholm seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a standard 160-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of Section 18, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to the **Sombrero 18 Fed 3BS Com #2H well** to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 7 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 18.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Jacob Daniels, Landman	Affidavit	Approx. 8
Josh Kuhn, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

Chisholm requests that Case Nos. 21821 and 21822 be consolidated for purposes of presenting the cases at hearing. If uncontested at the time of hearing, Chisholm plans to present these cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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