

**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. 21799, 21800**

**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  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421  
(505) 983-6043 Facsimile

**OTHER PARTY**

EOG Resources, Inc.

**ATTORNEY**

Jobediah Rittenhouse  
216 16th St., Suite 1100  
Denver, CO 80202  
(303) 407-4499  
jrittenhouse@bwenergylaw.com

**APPLICANT’S STATEMENT OF THE CASE**

In Case No. 21799, Chisholm seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 320.12-acre, more or less, horizontal spacing unit comprised of the W/2 W/2 of Section 34, Township 19 South, Range 33 East, and the W/2 W/2 of Section 3, Township 20 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to (1) the **Jade 34-3 Fed Com 2BS #5H well** to be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 34 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 3 and (2) the **Jade 34-3 Fed Com 1BS #9H well** to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 34 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 3.

In Case No. 21800, Chisholm seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 320.03-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of Section 34, Township 19 South, Range 33 East, and the E/2 W/2 of Section 3, Township 20 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to (1) the **Jade 34-3 Fed Com 2BS #6H well** and (2) the **Jade 34-3 Fed Com 1BS #10H well**, both of which are to be horizontally drilled from a common surface location in the NE/4 NW/4 (Unit C) of Section 34 to bottom hole locations in the SE/4 SW/4 (Unit N) of Section 3.

**APPLICANT’S PROPOSED EVIDENCE**

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

**PROCEDURAL MATTERS**

Chisholm requests that Case Nos. 21799 and 21800 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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Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
kaluck@hollandhart.com

**ATTORNEYS FOR CHISHOLM ENERGY  
OPERATING, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 15, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Beatty & Wozniak, P.C.  
Jobediah Rittenhouse  
216 16th St., Suite 1100  
Denver, CO 80202  
(303) 407-4499  
[jrittenhouse@bwenergylaw.com](mailto:jrittenhouse@bwenergylaw.com)

*Attorney for EOG Resources, Inc.*



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Adam G. Rankin