

**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 NOS. 21849-21850

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

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

APPEARANCES

APPLICANT

Chisholm Energy Operating, LLC

ATTORNEY

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APPLICANT'S STATEMENT OF THE CASES

In **Case No. 21849**, Chisholm seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Sections 7 and 18, Township 19 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to the **Thunderbird 18-7 Fed Com**

1BS #3H Well to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 18 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 7.

In **Case No. 21850**, Chisholm seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 7 and 18, Township 19 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to the **Thunderbird 18-7 Fed Com 1BS #4H Well** to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 18 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 7.

The completed intervals for both wells will comply with standard setbacks for oil wells.

APPLICANT'S PROPOSED EVIDENCE

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

PROCEDURAL MATTERS

Chisholm requests that Case Nos. 21849 and 21850 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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