

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

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

Case No. 21849 & 21850

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Mewbourne Oil Company ("Mewbourne") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Chisholm Energy Operating, LLC

APPLICANT'S ATTORNEY

Holland & Hart LLP

OPPONENT

Mewbourne Oil Company
Suite 1020
500 West Texas
Midland, Texas 79701

OPPONENT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Corey Mitchell
(432) 682-3715

STATEMENT OF THE CASE

APPLICANT

Chisholm Energy Operating, LLC ("Chisholm") seeks orders pooling the Bone Spring formation underlying (collectively) the E/2 of Section 7 and the E/2 of Section 18, Township 19 South, Range 33 East, NMPM.

OPPONENT

Mewbourne owns working interests in the proposed well units, and operates Section 18, but has not received well proposals from Chisholm, nor has had any contact from Chisholm on these proposed wells, and has not received certified notice of the applications.

Mewbourne just today saw the OCD docket regarding these matters, and therefore this pre-hearing statement is filed late. Mewbourne objects to these applications being heard by affidavit, and objects to the granting of the applications.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENTS

WITNESSES

EST. TIME

EXHIBITS

Corey Mitchell
(landman)

20 min.

Approx. 4

PROCEDURAL MATTERS

Mewbourne requests that this case be set for a status conference.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE


I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 3rd day of May, 2021 via e-mail:

Michael Feldewert
mfeldewert@hollandhart.com

Adam Rankin
agrarkin@hollandhart.com

Julia Broggi
jbroggi@hollandhart.com

Kaitlyn Luck
kaluck@hollandhart.com



James Bruce