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

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

CASE NO. 22051

CHISHOLM ENERGY OPERATING, LLC'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT ATTORNEY

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APPLICANT'S STATEMENT OF THE CASE

In Case No. 22051, Chisholm seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool [98220]) in the 640-acre horizontal spacing unit comprised of the E/2 of Sections 21 and 28, Township 23 South, Range 26 East, NMPM, Eddy County, New Mexico. This unit will be initially dedicated to the following proposed initial wells:

- (1) the Cletus 28-21 Fed Com WCA #2H well (API No. 30-015-45409), to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 28 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 21; and
- (2) the Cletus 28-21 Fed Com WCA #3H well (API No. 30-015-45407), to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 28 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 21.

The completed interval of the proposed wells will comply with setbacks for the Purple Sage; Wolfcamp (Gas) Pool.

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

If uncontested at the time of hearing, Chisholm plans to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

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QUESTIONS

Action 38665

QUESTIONS

Operator:	OGRID:
CHISHOLM ENERGY OPERATING, LLC	372137
801 Cherry Street	Action Number:
Fort Worth, TX 76102	38665
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witness	2	
Testimony time (in minutes)	11	