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 NO. 22175

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

Chisholm Energy Operating, LLC 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

APPLICANT'S STATEMENT OF THE CASE

In Case No. 22051, Chisholm seeks an order pooling all uncommitted interests in the Bone Spring formation, from the top of the Bone Spring formation to a depth of 9,651 feet, underlying a standard 324.18-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Sections 2 and 11, Township 19 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to the proposed initial **Ram 2-11 Fed 1BS Com #10H well** to be horizontally drilled from a surface location in the NE/4 NE/4 (Lot 1) of Section 2 to a bottom hole location in

the SW/4 SE/4 (Lot O) of Section 11. The completed interval of the proposed well will comply with Statewide 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

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

Respectfully submitted,

HOLLAND & HART LLP

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

agrankin@hollandhart.com

jbroggi@hollandhart.com

kaluck@hollandhart.com

ATTORNEYS FOR CHISHOLM ENERGY OPERATING, LLC

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720 District III 1000 Rio Brazos Rd., Aztec, NM 87410

Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 53205

QUESTIONS

Operator:	OGRID:
CHISHOLM ENERGY OPERATING, LLC	372137
801 Cherry Street	Action Number:
Fort Worth, TX 76102	53205
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	