

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

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

CASE NO. 20920

CHISHOLM'S PRE-HEARING STATEMENT

Chisholm Energy Operating, LLC ("Chisholm") (OGRID No. 327137), the applicant in the above-referenced case, 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

APPLICANT'S STATEMENT OF CASE

Chisholm seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp [98220]) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 20 and 29, Township 23 South, Range 26 East, NMPM,

Eddy County, New Mexico. Chisholm seeks to dedicate the above-referenced horizontal spacing unit to the following proposed initial wells:

- the **Asteroid 20-29 Fed Com WCA #1H Well**, which will be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 20 to bottom hole location in the SW/4 SE/4 (Unit O) of Section 29; and
- the **Asteroid 20-29 Fed Com WCA #2H Well**, which will be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 20 to bottom hole location in the SE/4 SE/4 (Unit P) of Section 29.

The completed interval for these proposed initial wells will remain within the setback requirements of the Special Rules for the Purple Sage Wolfcamp Pool.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Luke Shelton, Landman	Affidavit	Approx. 5
George Roth, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

Chisholm intends to present this case by affidavits if it is unopposed at hearing.

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

agrarkin@hollandhart.com

jbroggi@hollandhart.com

kaluck@hollandhart.com

**ATTORNEYS FOR CHISHOLM ENERGY
OPERATING, LLC**