

2017 OCT 19 P 4: 20

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

APPLICATION OF CHISOLM ENERGY OPERATING, LLC
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO

CASE NO. 15866

PRE-HEARING STATEMENT

Great Western Drilling Ltd. and Great Western Drilling Company ("Great Western"), provisionally provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

GREAT WESTERN DRILLING LTD.
AND GREAT WESTERN DRILLING
COMPANY

GREAT WESTERN DRILLING LTD.
AND GREAT WESTERN DRILLING
COMPANY'S ATTORNEY

J. Scott Hall, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
Tele (505) 982-3873
shall@montand.com

APPLICANT

CHISOLM ENERGY OPERATING, LLC

APPLICANT'S ATTORNEY

Michael H. Feldewert
Jordan L. Kessler
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, NM 87504-2208
mfeldewert@hollandhart.com
jlkessler@hollandhart.com

STATEMENT OF THE CASE

Applicant Chisolm Energy Operating, LLC seeks an order (1) creating a non-standard 160-acre, more or less, spacing and proration unit comprised of the E/2 W/2 of Section 34, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Bone Spring formation underlying this acreage.

Great Western has made countervailing development proposals to Chisolm and other interest owners. Great Western also proposes to operate its wells on the proposed non-standard units. Great Western therefore opposes Chisolm Energy’s Application.

PROPOSED EVIDENCE

<u>OPPONENT:</u> GREAT WESTERN DRILLING LTD. AND GREAT WESTERN DRILLING COMPANY	<u>EST. TIME</u>	<u>EXHIBITS</u>
--	------------------	-----------------

WITNESSES:

Carter Muire or Tom Magee, Land	15 minutes	6
Russell Rich or Terry Worthington, Geo	20 minutes	6

<u>APPLICANT:</u> CHISOLM ENERGY OPERATING, LLC	<u>EST. TIME</u>	<u>EXHIBITS</u>
---	------------------	-----------------

WITNESSES:

PROCEDURAL MATTERS

Great Western is requesting that the hearing in this matter be continued to the November 30, 2017 Examiner hearing docket.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: T. Scott Hall

J. Scott Hall

Seth C. McMillan

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

shall@montand.com

smcmillan@montand.com

*Attorneys for Great Western Drilling Ltd. and
Great Western Drilling Company*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on October 19, 2017:

Michael H. Feldewert

Jordan L. Kessler

Holland & Hart, LLP

Post Office Box 2208

Santa Fe, NM 87504-2208

mfeldewert@hollandhart.com

jlkessler@hollandhart.com

T. Scott Hall

J. Scott Hall