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

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

**CASE NOS. 15865, 15866,  
15867, 1586 - Consolidated**

**APPLICATION OF GREAT WESTERN DRILLING LTD.  
FOR A NON-STANDARD OIL SPACING AND  
PRORATION UNIT AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 15875, 15876  
- Consolidated**

**AMENDED PRE-HEARING STATEMENT**

Great Western Drilling Ltd. and Great Western Drilling Company ("Great Western"), along with Advance Energy Partners ("Advance" or "AEP") provide this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

**APPLICANTS AND RESPONDENTS**

**GREAT WESTERN DRILLING LTD.  
AND GREAT WESTERN DRILLING  
COMPANY**

**ADVANCE ENERGY PARTNERS**

**GREAT WESTERN DRILLING LTD.,  
GREAT WESTERN DRILLING  
COMPANY AND ADVANCE ENERGY  
PARTNERS' ATTORNEY**

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OTHER PARTIES

CHISHOLM ENERGY OPERATING,  
LLC

TIM S. CASHON, JOHN R. DELANEY  
and ALLENCRESTNM I

MEWBOURNE OIL COMPANY

OTHER PARTIES' ATTORNEY

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**STATEMENT OF THE CASE**

Chisolm Energy Operating, LLC and Great Western have filed countervailing compulsory pooling/non-standard unit applications covering lands in Section 34, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico which seek to pool all uncommitted interests in the Bone Spring formation underlying the acreage described in the Applications. All six of the Applications filed by the parties should be consolidated for hearing.

Great Western has made countervailing development proposals to Chisolm and other interest owners. Recently, Great Western and Advance Energy Partners have reached agreement for Advance to acquire Great Western's acreage interests in Section 34. Advance will operate the properties going forward and has accordingly intervened in these matters. Representatives from both companies will be in attendance at the hearing. Advance Energy Partners adopts this and the previous Pre-Hearing Statements filed by Great Western in these matters.

## **PROPOSED EVIDENCE**

	<u>EST. TIME</u>	<u>EXHIBITS</u>
GREAT WESTERN DRILLING LTD. GREAT WESTERN DRILLING COMPANY AND ADVANCE ENERGY PARTNERS		

WITNESSES:

	15 minutes	6
Carter Muire or Tom Magee, Land (Great Western)		
	20 minutes	6
Russell Rich or Terry Worthington, Geo (Great Western)		
David Scott, Land (AEP)	10 minutes	6
Dave Harwell, Petroleum Engineer (AEP)	20 minutes	6

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

WITNESSES:

	<u>EST. TIME</u>	<u>EXHIBITS</u>
TIM S. CASHON, JOHN R. DELANEY and ALLENCRESTNM		

WITNESSES:

	<u>EST. TIME</u>	<u>EXHIBITS</u>
MEWBOURNE OIL COMPANY		

WITNESSES:

## **PROCEDURAL MATTERS**

The six Applications in these matters should be consolidated for hearing.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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*Attorneys for Great Western Drilling Ltd.,  
Great Western Drilling Company and Advance  
Energy Partners*

**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 December 11, 2017:

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*Attorney for Mewbourne Oil Company, et al.*

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