

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

**APPLICATIONS OF CHISHOLM ENERGY  
OPERATING, LLC FOR COMPULSORY  
POOLING, LEA COUNTY, NEW MEXICO.**

**CASE NOS. 21140, 21141, 21143**

**CHISHOLM'S PRE-HEARING STATEMENT**

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

In **Case No. 21140**, Chisholm seeks an order pooling all uncommitted interests in the Bone Spring formation (WC-025 G-08 S213304D; BONE SPRING [Pool Code 97895]) underlying a standard 238.85-acre, more or less, horizontal spacing unit comprised of the W/2 W/2 of irregular Section 1, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. Chisholm seeks to dedicate the proposed initial **Minis 1 Fed Com 3BS #4H well** (API No. 30-025-44847)

to be horizontally drilled from a surface location in the NW/4 NW/4 (Lot 4) of Section 1 to bottom hole location in the SW/4 SW/4 (Unit M) of Section 1.

In **Case No. 21141**, Chisholm seeks an order pooling all uncommitted interests in the Bone Spring formation (WC-025 G-08 S213304D; BONE SPRING [Pool Code 97895]) underlying a standard 238.81-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of irregular Section 1, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. Chisholm seeks to dedicate the proposed initial **Minis 1 Fed Com 3BS #5H well** (API No. 30-025-44848) to be horizontally drilled from a surface location in the NW/4 NW/4 (Lot 4) of Section 1 to bottom hole location in the SE/4 SW/4 (Unit N) of Section 1.

In **Case No. 21143**, Chisholm seeks an order pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-08 S213201D; UPR WOLFCAMP [Pool Code 98282]) underlying a standard 238.81-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of irregular Section 1, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. Chisholm seeks to dedicate the proposed initial **Minis 1 Fed Com WCA #13H well** (API No. 30-025-45130) to be horizontally drilled from a surface location in the NW/4 NW/4 (Lot 4) of Section 1 to bottom hole location in the SE/4 SW/4 (Unit N) of Section 1.

In **Case Nos. 21140, 21141, and 21143**, the completed intervals of these proposed wells will comply with Statewide setbacks for oil wells.

**APPLICANT'S PROPOSED EVIDENCE**

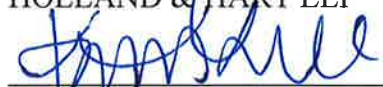
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Jacob Daniels, Landman	Affidavit	Approx. 5
Josh Kuhn, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

Chisholm intends to present these cases by affidavits if it is unopposed at hearing.

Respectfully submitted,

HOLLAND & HART LLP



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Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Kaitlyn A. Luck

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Santa Fe, New Mexico 87504-2208

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[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)

[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)

[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

**ATTORNEYS FOR CHISHOLM ENERGY  
OPERATING, LLC**