

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

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

**CASE NOS. 21673 & 21674**

**CHISHOLM ENERGY OPERATING, LLC'S  
CONSOLIDATED PRE-HEARING STATEMENT**

Chisholm Energy Operating, LLC ("Chisholm") (OGRID No. 327137), the applicant submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Chisholm Energy Operating, LLC

**ATTORNEY**

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**OTHER PARTY**

Marathon Oil Permian LLC

**ATTORNEY**

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**APPLICANT’S STATEMENT OF THE CASES**

In Case No. 21673, Chisholm seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 11 and 14, Township 20 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to the **Anaconda 11-14 Fed Com 3BS #7H Well** to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 11 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 14.

In Case No. 21674, Chisholm seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Sections 11 and 14, Township 20 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to the **Anaconda 11-14 Fed Com 3BS #13H Well** to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 11 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 14.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Jacob Daniels, Landman	Affidavit	Approx. 8
Josh Kuhn, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

Chisholm requests that Case Nos. 21673 and 21674 be consolidated and anticipates presenting these consolidated cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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**ATTORNEYS FOR CHISHOLM ENERGY  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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