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. 21823

CHISHOLM ENERGY OPERATING, LLC'S 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	TORNEY
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Chisholm Energy Operating, LLC 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

OTHER PARTY ATTORNEY

None

APPLICANT'S STATEMENT OF THE CASES

In Case No. 21823, Chisholm seeks an order pooling all uncommitted interest owners in the Wolfcamp formation underlying a standard 303.56-acre, more or less, horizontal spacing unit comprised of the W/2 of Section 18, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico. This unit will be initially dedicated to the **Sombrero 18 Fed WCA Com #5H well** to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 7 to a bottom hole location in the SW/4 SW/4 (Lot 4) of Section 18.

APPLICANT'S PROPOSED EVIDENCE

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

PROCEDURAL MATTERS

If uncontested at the time of hearing, Chisholm plans to present this case by affidavit.

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
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

ATTORNEYS FOR CHISHOLM ENERGY OPERATING, LLC