

RECEIVED OGD

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. 15867**

**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](mailto: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](mailto:mfeldewert@hollandhart.com)  
[jlkessler@hollandhart.com](mailto: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 W/2 E/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: J. Scott Hall

J. Scott Hall  
Seth C. McMillan

Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873

[shall@montand.com](mailto:shall@montand.com)  
[smcmillan@montand.com](mailto: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](mailto:mfeldewert@hollandhart.com)  
[jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

J. Scott Hall

J. Scott Hall