

**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. 20520 & 20521**

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

Chisholm Energy Operating, LLC ("Chisholm") (OGRID No. 327137), the applicant in the above-referenced matters, 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. 20520, Chisholm seeks an order pooling all uncommitted interests in the Bone Spring formation in the Grama Ridge; Bone Spring Pool (Pool Code 28430) underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Section 14 and the W/2 NE/4 of Section 23, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico.

Chisholm seeks to dedicate the above-referenced horizontal spacing unit to its proposed **Outland 14-23 State Com 1BS 8H Well**, which will be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 14 to bottom hole location in the SW/4 NE/4 (Unit G) of Section 23. The completed interval will comply with the Statewide setback requirements for oil wells.

In Case No. 20521, Chisholm seeks an order pooling all uncommitted interests in the Bone Spring formation in the Grama Ridge; Bone Spring Pool (Pool Code 28430) underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Section 14 and the E/2 NE/4 of Section 23, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico. Chisholm seeks to dedicate the above-referenced horizontal spacing unit to its proposed **Outland 14-23 State Com 1BS 9H Well**, which will be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 14 to bottom hole location in the SE/4 NE/4 (Unit H) of Section 23. The completed interval will comply with the Statewide setback requirements for oil wells.

#### **APPLICANT'S PROPOSED EVIDENCE**

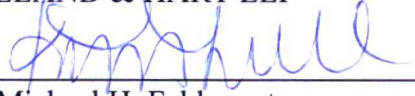
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Beau Sullivan, Landman	Approx. 10	Approx. 5
Bill Francis, Geologist	Approx. 10	Approx. 3

#### **PROCEDURAL MATTERS**

Chisholm requests that Case Nos. 20520 and 20521 be consolidated for purposes of hearing. If uncontested, Chisholm anticipates presenting these cases by affidavits.

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

(505) 988-4421

(505) 983-6043 Facsimile

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

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

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

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

**ATTORNEYS FOR CHISHOLM ENERGY  
OPERATING, LLC**