

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

**APPLICATION OF CATAMOUNT ENERGY PARTNERS, LLC,
FOR APPROVAL OF A NON-STANDARD HORIZONTAL WELL
SPACING UNIT AND COMPULSORY POOLING,
SAN JUAN AND RIO ARRIBA COUNTIES, NEW MEXICO.**

CASE NO. _____

APPLICATION

Catamount Energy Partners, LLC (“Catamount” or “Applicant”) (OGRID No. 308973), through its undersigned attorneys, hereby files this application with the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-17 and § 70-2-18, for an order (a) creating a 1440-acre, more or less, non-standard horizontal well spacing unit in the Mancos formation [Basin Mancos Pool (97232)] underlying the N2 and the N2S2 of Sections 13, 14 and 15, Township 32 North, Range 6 West, NMPM, San Juan and Rio Arriba Counties, New Mexico, and (b) pooling the uncommitted mineral interest owners in this proposed non-standard horizontal well spacing unit. In support of its application, Applicant states:

1. Applicant is a working interest owner in the proposed horizontal well spacing unit and has the right to drill thereon.
2. Applicant seeks to initially dedicate the above-referenced spacing unit to the following proposed wells:
 - **NLS 32-6-15 3H** and the **NLS 32-6-15 4H** wells to be drilled from a surface location in the NE4 of Section 16, with first take points in the SW4NW4 (Unit E) of Section 15 and last take points in the SE4NE4 (Unit H) of Section 13; and

- **NLS 32-6-15 5H** well to be drilled from a surface location in the NE4 of Section 16, with a first take point in the NW4SW4 (Unit L) of Section 15 and a last take point in the NE4SE4 (Unit I) of Section 13.

3. The approval of the non-standard spacing unit is necessary to minimize costs, minimize surface disturbance and to accommodate the San Juan 32-5 Federal Unit that extends into the S2S2 of Section 14.

4. This acreage is within the Basin Manco (Gas) Pool [97232] created by Division Order R-12984 providing for 320-acre spacing.

5. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all the interest owners in the subject spacing unit.

6. Approval of this application will allow Applicant to obtain a just and fair share of the oil and gas underlying the subject lands, will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on December 5, 2024, and, after notice and hearing as required by law, the Division enter an order:

- A. Approving the non-standard horizontal well spacing unit and pooling all uncommitted interests in the horizontal spacing unit;
- B. Approving the initial wells in the spacing unit;
- C. Designating Applicant as the operator of this spacing unit and the horizontal wells to be drilled thereon;
- D. Authorizing Applicant to recover its costs of drilling, equipping, and completing the wells;

- E. Approving the actual operating charges and costs of supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells against any working interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

**ATTORNEYS FOR CATAMOUNT ENERGY PARTNERS,
LLC.**

CASE _____: **Application of Catamount Energy Partners, LLC, for Approval of a Non-Standard Horizontal Well Spacing Unit and Compulsory Pooling, San Juan and Rio Arriba Counties, New Mexico.** Applicant in the above-styled cause seeks an order (a) creating a 1440-acre, more or less, non-standard horizontal well spacing unit in the Mancos formation [Basin Mancos (Gas) Pool (97232)] underlying the N2 and the N2S2 of Sections 13, 14 and 15, Township 32 North, Range 6 West, NMPM, San Juan and Rio Arriba Counties, New Mexico, and (b) pooling the uncommitted mineral owners in this proposed non-standard horizontal well spacing unit. Applicant seeks to initially dedicate the above-referenced spacing unit to the following proposed wells:

- **NLS 32-6-15 3H** and **NLS 32-6-15 4H** wells to be drilled from a surface location in the NE4 of Section 16, with first take points in the SW4NW4 (Unit E) of Section 15 and last take points in the SE4NE4 (Unit H) of Section 13; and
- **NLS 32-6-15 5H** well to be drilled from a surface location in the NE4 of Section 16, with a first take point in the NW4SW4 (Unit L) of Section 15 and a last take point in the NE4SE4 (Unit I) of Section 13.

Also, to be considered will be the necessity of the non-standard spacing unit, the cost of drilling and completing the proposed wells, the allocation of the cost thereof, the actual operating costs and charges for supervision, the designation of applicant as operator, and the imposition of 200% charge for risk involved in drilling and completing the wells. Said area is located approximately 19 miles northeast of the town of Navajo Dam, New Mexico.