

**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. 24987

APPLICANT'S PRE- HEARING STATEMENT

Catamount Energy Partners, LLC ("Catamount" or "Applicant") submits this pre-hearing statement as required by the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Catamount Energy Partners, LLC

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

Applicant seeks an order (a) creating a 1440-acre, more or less, non-standard horizontal well spacing unit in the Mancos formation 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. This acreage borders the State of Colorado and is within the Basin Manco (Gas) Pool [97232] created by Division Order R-12984 providing for 320-acre spacing. 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 NW4 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 NW4 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.

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

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Denise Greer, Landman	Self-Affirmed Statement	Approx. 5
Russell R. Kelly, Geology	Self-Affirmed Statement	Approx. 4

PROCEDURAL MATTERS

Applicant intends to present this case by self-affirmed statements if it remains unopposed at the time of hearing

Respectfully submitted,

HOLLAND & HART LLP



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QUESTIONS

Action 416120

QUESTIONS

Operator: CATAMOUNT ENERGY PARTNERS LLC 600 17TH STREET STE 1400 S DENVER, CO 80202	OGRID: 308973
	Action Number: 416120
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.