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

APPLICATION OF CATENA RESOURCES OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

**CASE NO. 21093** 

Marathon Oil Permian LLC 5555 San Felipe Street Houston, TX 77056 (505) 264-8740

# **CATENA'S PRE- HEARING STATEMENT**

Catena Resources Operating, LLC ("Catena") submits this pre-hearing statement as required by the rules of the Oil Conservation Division.

# **APPEARANCES**

APPLICANT	ATTORNEY
Catena Resources Operating, LLC  OTHER APPEARANCES	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
Mewbourne Oil Company	James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043
Marathon Oil Permian LLC	Jennifer Bradfute

# **APPLICANT'S STATEMENT OF THE CASE**

Catena seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation underlying a standard 320-acre horizontal spacing unit comprised of the E/2 W/2 of Section 5, Township 19 South, Range 35 East, and E/2 W/2 of Section 32, Township 18 South, Range 35 East, NMPM, Lea County, New Mexico; and (2) dedicating this horizontal spacing unit to the proposed initial **Foxtail 19-35-05 1H** well to be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 8, Township 19 South, Range 35 East to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 32, Township 18 South, Range 35 East. The completed interval for the proposed well will comply with the statewide setback requirements for horizontal oil wells.

#### **PROPOSED EVIDENCE**

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Robert Swann, Landman	Affidavit	8
Vince Smith, Geologist	Affidavit	4

# **PROCEDURAL MATTERS**

Catena requests to present this case by affidavit, if unopposed at the time of hearing.

Respectfully submitted,

**HOLLAND & HART LLP** 

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ATTORNEYS FOR CATENA RESOURCES OPERATING, LLC

# **CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2020, I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

Jennifer Bradfute Marathon Oil Permian LLC 5555 San Felipe Street Houston, TX 77056 (505) 264-8740 jbradfute@marathonoil.com

# Attorney for Marathon Oil Permian LLC

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