

**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 NOS. 21353-21354

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

Catena Resources Operating, LLC

ATTORNEY

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OTHER APPEARANCES

Marathon Oil Permian LLC

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APPLICANT'S STATEMENT OF THE CASE

In these consolidated cases, Catena seeks an order pooling all uncommitted interests in the Bone Spring formation [Scharb; Bone Spring Pool (55610)] and the Wolfcamp formation [Scharb; Wolfcamp Pool (55640)] underlying two standard 480-acre horizontal spacing units comprised of the SW/4 of Section 33, Township 18 South, Range 35 East, and the W/2 of Section 4, Township 19 South, Range 35 East, NMPM, Lea County, New Mexico:

- Under Case 21353, Catena seeks to pool the Wolfcamp formation underlying the SW/4 of Section 33 and the W/2 of Section 4 and dedicating this horizontal spacing unit to the proposed **Alpha 183533 1H** well to be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 33 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 4. The completed interval for the proposed well will remain within 330 feet of the E/2 SW/4 of Section 33 and E/2 W/2 of Section 4 to include this offsetting acreage in a standard horizontal well spacing unit.
- Under Case 21354, Catena seeks to pool the Bone Spring formation underlying the SW/4 of Section 33 and the W/2 of Section 4 and dedicating this horizontal spacing to the proposed **Alpha 183533 2H** well to be horizontally drilled from a surface location in the NE/4 SW/4 (Unit K) of Section 33 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 4. The completed interval for the proposed well will remain within 330 feet of the E/2 SW/4 of Section 33 and E/2 W/2 of Section 4 to include this offsetting acreage in a standard horizontal well spacing unit.

PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Robert Swann, Landman	Affidavit	Approx. 6
Vince Smith, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Catena requests that these cases be consolidated for hearing and intends to present them by affidavit if unopposed at the hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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**ATTORNEYS FOR CATENA RESOURCES
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CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2020, I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

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Attorney for Marathon Oil Permian LLC



Michael H. Feldewert