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. 21355-21356

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 Michael H. Feldewert

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OTHER APPEARANCES

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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 [Airstrip; Bone Spring Pool (960)] and the Wolfcamp formation [Airstrip; Wolfcamp Pool (970)] underlying two standard 640-acre horizontal spacing units comprised of the E/2 of Sections 20 and 29, Township 18 South, Range 35 East, Lea County, New Mexico:

- Under <u>Case 21355</u>, Catena seeks to pool the Wolfcamp formation underlying the E/2 of Sections 20 and 29, and dedicating this horizontal spacing unit to the proposed **Ball 183529 1H** well to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 32 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 20. The completed interval for the proposed well will remain within 330 feet of the W/2 E/2 of Sections 20 and 29 to allow inclusion of this offsetting acreage in a standard horizontal well spacing unit.
- Under <u>Case 21356</u>, Catena seeks to pool the Bone Spring formation underlying the E/2 of Sections 20 and 29, and dedicating this horizontal spacing unit to the proposed **Ball 183529 2H** well to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 32 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 20. The completed interval for the proposed well will remain within 330 feet of the W/2 E/2 of Sections 20 and 29 to allow inclusion of 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,

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ATTORNEYS FOR CATENA RESOURCES OPERATING, LLC

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