

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

**APPLICATION OF GMT EXPLORATION COMPANY
LLC FOR A NON-STANDARD OIL SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

CASE NO 15659

AMENDED PRE-HEARING STATEMENT

Black Mountain Operating LLC ("Black Mountain), provisionally provides this Amended
Pre Hearing Statement as required by the rules of the Division

APPEARANCES

BLACK MOUNTAIN OPERATING LLC

**BLACK MOUNTAIN OPERATING
LLC'S ATTORNEY**

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APPLICANT

APPLICANT S ATTORNEY

GMT EXPLORATION COMPANY LLC

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STATEMENT OF THE CASE

Applicant GMT Exploration Company LLC seeks an order (1) approving a non standard
oil spacing and proration unit in the Bone Spring formation comprised of the W½W½ of Section 2,

Township 22 South Range 34 East, N M P M Lea County New Mexico, and (2) pooling all mineral interests in the Bone Spring formation underlying the non-standard unit

Black Mountain Operating LLC opposes this Application The proposed well and project area are in conflict with the well and non-standard spacing unit previously proposed by Black Mountain Operating LLC affecting the subject lands

PROPOSED EVIDENCE

OPPONENT BLACK MOUNTAIN OPERATING LLC EST TIME EXHIBITS

WITNESSES

Luke Mildren, Land 20 min 5

Jay Moore, Geologist 20 min 5

Michael McCracken, Petroleum Engineer 20 min 5

APPLICANT GMT EXPLORATION COMPANY LLC EST TIME EXHIBITS

WITNESSES

PROCEDURAL MATTERS

This matter should be consolidated for hearing with Case Nos 15655, 15656 and 15660 Black Mountain is also filing herewith a Motion for Continuance of these matters that is opposed by GMT Exploration Company LLC

Respectfully submitted,

MONTGOMERY & ANDREWS, P A

By  _____

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Attorneys for Black Mountain Operating LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on May 4, 2017

James Bruce
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Seth C McMillan