

**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. 24830

APPLICANT’S PRE- HEARING STATEMENT

Catamount Energy Partners, LLC (“Catamount” or “Applicant”) (OGRID No. 308973) submits this pre-hearing statement as required by the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Catamount Energy Partners, LLC

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Paula M. Vance, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

OTHER PARTIES

None

ATTORNEY

APPLICANT’S STATEMENT OF CASE

Applicant seeks an order (a) creating a 1941.18-acre, more or less, non-standard horizontal well spacing unit in the Mancos formation [Basin Mancos (Gas) Pool (97232)] underlying Lots 1-4, S2N2 and SE4 of irregular Section 9, Lots 1-4, S2N2 and S2 of irregular Sections 10 and 11, and Lots 1-4, S2N2, SW4 and the NW4SE4 of irregular Section 12, 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, contains irregular sections and falls 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:

- **Miller Mesa 32-6-10 1H** well to be drilled from a surface location in the NE4 of irregular Section 10 with a first take point in SENE (Unit H) of irregular Section 10 and at last take point in SW4NW4 (Unit E) of irregular Section 9;
- **Miller Mesa 32-6-11 1H** well to be drilled from a surface location in the NE4 of irregular Section 10 with a first take point in the SW4NW4 (Unit E) of irregular Section 11 and at last take point in the SE4NE4 (Unit H) of irregular Section 12; and
- **NLN 32-6-9 2H** well to be drilled from a surface location in the SW4 of Section 9, with a first take point in the NW4SE4 (Unit J) of Section 9 and at last take point the NW4SE4 (Unit J) of Section 12.

Approval of the non-standard spacing unit is necessary to minimize costs and surface disturbance; and to accommodate the Allison Federal Unit extending into the SW4 of Section 9, development under Navajo Lake, the land configuration associated with irregular Sections 9, 10, 11 and 12 bordering the State of Colorado, and unleased federal acreage in the NE4SE4 and the S2SE4 of irregular Section 12.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Denise Greer, Landman	Affidavit	Approx. 6
Paul Spear, Geology	Affidavit	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



Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

**ATTORNEYS FOR CATAMOUNT ENERGY PARTNERS,
LLC**

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 389755

QUESTIONS

Operator: CATAMOUNT ENERGY PARTNERS LLC 600 17TH STREET STE 1400 S DENVER, CO 80202	OGRID: 308973
	Action Number: 389755
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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