

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

**APPLICATION OF CATENA RESOURCES OPERATING,
LLC FOR COMPUSLORY POOLING,
LEA COUNTY, NEW MEXICO**

Case No. 21460

**APPLICATION OF CATENA RESOURCES OPERATING,
LLC FOR COMPUSLORY POOLING,
LEA COUNTY, NEW MEXICO**

Case No. 21483

**CATENA RESOURCES OPEARATING, LLC'S
PREHEARING STATEMENT**

This Pre-hearing Statement is submitted by Catena Resources Operating, LLC by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT: Catena Resources Operating, LLC

ATTORNEY: Ernest L. Padilla
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OPPOSITION OR OTHER PARTY: COG Operating, LLC

ATTORNEY: Ocean Munds-Dry
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Santa Fe, NM 87501
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OPPOSITION OR OTHER PARTY: Matador Production Company
MRC Permian Company

ATTORNEY: James Bruce
Post Office Box 1056
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STATEMENT OF CASE

APPLICANT:

Applicant seeks a compulsory pooling order:

(1) to pool the Wolfcamp formation underlying the E/2 of Sections 8 and 17 and dedicating this horizontal spacing unit to the proposed **Rambo 1H**, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 20 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 8.

(2) to pool the Scharb Bone Spring Pool underlying the E/2 E/2 of Sections 8 and 17 and dedicating this horizontal spacing unit to the proposed **Rambo 2H**, to be horizontally drilled from a surface location in Unit B of Section 20 to a bottom hole location in Unit A in Section 8, Township 19 South, Range 35 East, NMPM, Lea County, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Christopher Canon (Land)	15 Minutes	approximately 8
Brian Moore (Geology)	15 Minutes	approximately 5

PROCEDURAL MATTERS

Matador has filed competing applications in Cases 21578 and 21579. Catena and Matador are close to a resolution of their competing positions. Matador will continue its cases. Catena will not seek to pool the Matador interests. Because there is an unleased 40-acre tract within the Catena proposed spacing which will be on the State Land Office's May lease sale, Catena will ask that an order be deferred until after the SLO lease sale and an oil and gas lease issued as a result of the sale. Should Catena fail to acquire the lease, then it will necessarily have to comply with well proposals and notice requirements of the Division and thereafter seek to re-open the case as to a successful bidder.

Matador has dropped its objection to an affidavit case. All other parties do not oppose an affidavit case, therefore, Catena will present these cases by affidavit.

Respectfully submitted:

PADILLA LAW FIRM, P.A.

/s/ Ernest L. Padilla

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading was electronically mailed to the following:

James Bruce
Ocean Munds-Dry

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on this 15th day of April, 2021.

/s/ Ernest L. Padilla

Ernest L. Padilla