

**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 NO. 21180

CATENA RESOURCES OPERATING, LLC'S PRE-HEARING STATEMENT

Catena Resources Operating, LLC ("Catena") (OGRID No. 328449) submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Catena Resources Operating, LLC

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Kaitlyn A. Luck, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
TEL: (505) 988-4421
FAX: (505) 983-6043
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

APPLICANT'S STATEMENT OF CASE

Catena seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 324.13-acre, more or less, horizontal spacing unit comprised of the W/2 W/2 of Section 35, Township 18 South, Range 34 East, and the W/2 W/2 of Section 2, Township 19 South, Range 34 East, NMPM, Lea County new Mexico. Catena proposes to dedicate the

above-referenced spacing unit to the proposed **Parallel 193402 No. 1H Well**, to be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 2 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 35. The completed interval for the proposed well will comply with the statewide setback requirements for horizontal oil wells.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Robert Swann – Landman	By Affidavit	Approx. 3
Vince Smith – Geologist	By Affidavit	Approx. 4

PROCEDURAL MATTERS

Catena anticipates presenting this case by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

/s/ Julia Broggi

By: _____

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
P.O. Box 2208
Santa Fe, NM 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
Email: mfeldewert@hollandhart.com
Email: agrarkin@hollandhart.com
Email: jbroggi@hollandhart.com
Email: kaluck@hollandhart.com

**ATTORNEYS FOR CATENA RESOURCES
OPERATING, LLC**