

7017 1-2

**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 15660

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	<u>BLACK MOUNTAIN OPERATING LLC'S ATTORNEY</u> J Scott Hall, Esq Seth C McMillan, Esq MONTGOMERY & ANDREWS, P A P O Box 2307 Santa Fe, NM 87504-2307 Tele (505) 982 3873 <u>shall@montand com</u> <u>smcmillan@montand com</u>
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<u>APPLICANT</u> GMT EXPLORATION COMPANY LLC	<u>APPLICANT S ATTORNEY</u> James Bruce Post Office Box 1056 Santa Fe, NM 87504 <u>jamesbruc@aol com</u>
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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 E½W½ 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

<u>OPPONENT</u>	BLACK MOUNTAIN OPERATING LLC	<u>EST TIME</u>	<u>EXHIBITS</u>
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WITNESSES

Luke Mildren, Land	20 min	5
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Jay Moore, Geologist	20 min	5
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Michael McCracken, Petroleum Engineer	20 min	5
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<u>APPLICANT</u>	GMT EXPLORATION COMPANY LLC	<u>EST TIME</u>	<u>EXHIBITS</u>
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WITNESSES

PROCEDURAL MATTERS

This matter should be consolidated for hearing with Case Nos 15655, 15656 and 15659
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