

**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 NOS. 21351-21352

CATENA'S PRE- HEARING STATEMENT

Catena Resources Operating, LLC ("Catena") submits this pre-hearing statement as required by the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Catena Resources Operating, LLC

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

OTHER APPEARANCES

Marathon Oil Permian LLC

Deana M. Bennett
Post Office Box 2168
500 Fourth Street NW Suite 1000
Albuquerque, New Mexico 87103-2168
505.848.1800

APPLICANT’S STATEMENT OF THE CASE

In these consolidated cases, Catena seeks an order pooling all uncommitted interests in the Bone Spring formation [Airstrip; Bone Spring Pool (960)] and the Wolfcamp formation [Airstrip; Wolfcamp Pool (970)] underlying two standard 640-acre horizontal spacing units comprised of the E/2 of Sections 19 and 30, Township 18 South, Range 54 East, NMPM, Lea County:

- Under Case 21351, Catena seeks to pool the Wolfcamp formation underlying the E/2 of Sections 19 and 30 and dedicating this horizontal spacing unit to the proposed **Rope 183519 1H** well to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 18 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 30. The completed interval for the proposed well will remain within 330 feet of the W/2 E/2 of Sections 19 and 30 to allow inclusion of this offsetting acreage in a standard horizontal well spacing unit
- Under Case 21352, Catena seeks to pool the Bone Spring formation underlying the E/2 of Sections 19 and 30 and dedicating this horizontal spacing unit to the proposed **Rope 183519 2H** well to be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 18 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 30. The completed interval for the proposed well will remain within 330 feet of the W/2 E/2 of Sections 19 and 30 to allow inclusion of this offsetting acreage in a standard horizontal well spacing unit

PROPOSED EVIDENCE

WITNESSES
Name and Expertise

ESTIMATED TIME

EXHIBITS

Robert Swann,
Landman

Affidavit

Approx. 6

Vince Smith,
Geologist

Affidavit

Approx. 4

PROCEDURAL MATTERS

Catena requests that these cases be consolidated for hearing and intends to present them by affidavit if unopposed at the hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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

**ATTORNEYS FOR CATENA RESOURCES
OPERATING, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2020, I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

Deana M. Bennett
dmb@modrall.com

Attorney for Marathon Oil Permian LLC



Michael H. Feldewert