

2017 MAR 22 P 2:26

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

**APPLICATION OF BLACK MOUNTAIN OPERATING LLC  
FOR A NON-STANDARD OIL SPACING AND PRORATION  
UNIT, COMPULSORY POOLING, AND AN UNORTHODOX  
WELL LOCATION, LEA COUNTY, NEW MEXICO**

**CASE NO. 15656**

**PRE-HEARING STATEMENT**

Black Mountain Operating LLC ("Black Mountain provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

**APPLICANT:**

BLACK MOUNTAIN OPERATING LLC

**BLACK MOUNTAIN OPERATING  
LLC'S ATTORNEY**

J. Scott Hall, Esq.  
MONTGOMERY & ANDREWS, P.A.  
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Santa Fe, NM 87504-2307  
(505) 982-3873  
[shall@montand.com](mailto:shall@montand.com)

**OPPONENT/OTHER PARTIES**

GMT EXPLORATION COMPANY LLC

**OPPONENT'S ATTORNEY**

James Bruce  
Post Office Box 1056  
Santa Fe, NM 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

**STATEMENT OF THE CASE**

Black Mountain Operating LLC seeks an order (1) approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the E/2SW/4 of Section 35, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico, and the E/2W/2 of

Section 2, Township 22 South, Range 34 East, NMPM, Lea County, New Mexico; and  
(2) pooling all mineral interests in the Bone Spring formation underlying the non-standard unit,  
and approving an unorthodox well location.

### **PROPOSED EVIDENCE**

#### APPLICANT'S WITNESSES

#### EST. TIME

#### EXHIBITS

Luke Mildren, Land

20 min.

5

Michael McCracken, Petroleum Engineer

20 min.

5

#### OPPONENT'S WITNESSES

#### EST. TIME

#### EXHIBITS

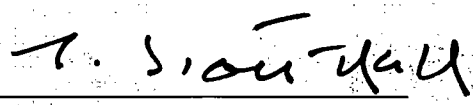
### **PROCEDURAL MATTERS**

The Application in this matter is opposed by GMT Exploration Company LLC. It should  
be consolidated for hearing with Case Nos. 15659 and 15660.

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 counsel of record by electronic mail on March 22, 2017:

James Bruce  
Post Office Box 1056  
Santa Fe, NM 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

A handwritten signature in black ink, reading "J. Scott Hall", written over a horizontal line.

J. Scott Hall