

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 15659**

**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     **BLACK MOUNTAIN OPERATING  
LLC'S ATTORNEY**

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**APPLICANT**

GMT EXPLORATION COMPANY LLC

**APPLICANT S ATTORNEY**

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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 W½W½ 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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<u>WITNESSES</u>
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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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<u>WITNESSES</u>
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### PROCEDURAL MATTERS

This matter should be consolidated for hearing with Case Nos 15655, 15656 and 15660  
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