

BEFORE THE OIL AND GAS CONSERVATION COMMISSION
OF THE STATE OF COLORADO

IN THE MATTER OF THE APPLICATION OF)
CATAMOUNT ENERGY PARTNERS LLC FOR)
AN ORDER POOLING NONCONSENTING)
INTERESTS IN THE FRUITLAND COAL)
SEAMS COVERING CERTAIN LANDS IN)
SECTION 18U OF TOWNSHIP 34 NORTH,)
RANGE 6 WEST, N.M.P.M., LA PLATA)
COUNTY, COLORADO.)

CAUSE NO.: 112

DOCKET NO.: 150900495

TYPE: POOLING

APPLICATION

Catamount Energy Partners LLC ("Catamount" or "Applicant"), Operator No. 10464, by and through its attorneys, Welborn Sullivan Meck & Tooley, P.C., respectfully submits this Application to the Oil and Gas Conservation Commission of the State of Colorado ("Commission" or "COGCC") for an order pooling all non-consenting interests in an approximate 320-acre drilling and spacing unit established in the N½ of Section 18U, Township 34 North, Range 6 West, N.M.P.M. (S.U.L.), La Plata County, Colorado for the development and production from the Fruitland coal seams. In support thereof, the Applicant states as follows:

1. Applicant is a corporation duly authorized to conduct business in the State of Colorado.
2. Applicant owns a leasehold interest in the following lands ("Application Lands"):

Township 34 North, Range 6 West, N.M.P.M. (S.U.L.)
Section 18U: Lots 1, 2, E/2NW/4, NE/4 aka N½

La Plata County, Colorado.

A reference map of the Application Lands is attached hereto.

1. On June 17, 1988, the Commission issued Order No. 112-60, which established 320-acre drilling and spacing units for production of gas from the Fruitland coal seams, with the permitted well to be located no closer than 990 feet from any outer boundary of the unit, nor closer than 130 feet from any interior quarter section line. The Application Lands are subject to this Order.

2. On December 17, 1990, the Commission issued Order No. 112-85, which approved two field rules for all wells producing from the Dakota, Mesaverde, Fruitland Pictured Cliffs, and Fruitland Coal Formations to protect the health, safety, and welfare of the citizens in the area.

3. On December 9, 2008, the Commission issued Order No. 112-215, which allowed up to four (4) wells to be drilled in each 320-acre drilling and spacing units subject to the Order for the production of gas from the Fruitland coal seams, with the permitted wells to be located no closer than six hundred sixty (660) feet from the unit boundary, with no interior section line setback. The Order further requires that the wells drilled pursuant to this Order must comply with the provisions of the MOU between BP America Production Company and La Plata County. The Application Lands are subject to this Order.

4. On October 27, 2014, the Commission issued Order No. 112-244, which pooled all interests in an approximate 320-acre drilling and spacing unit established for the Application Lands for the development and operation of the Fruitland Coal Seams, effective as of the earlier date of the date of August 28, 2014, or the date that any of the costs specified in § 34-60-116(7), C.R.S., were first incurred for the drilling of the Lynch 34-6-18 #1 well (API# 05-067-09920).

5. Applicant plans to drill and complete the Lynch 34-6-18 #2 well (API# 05-067-09921) with an anticipated spud date in Third Quarter 2015, in the N½ of Section 18U, Township 34 North, Range 6 West, N.M.P.M. (S.U.L.), La Plata County, Colorado with a surface location of 1,734 feet FNL and 209 feet FWL in Lot 2 of Section 18U. The above-described well is designed to test and produce gas and associated substances from the Fruitland coal seams underlying the Application Lands.

6. Applicant certifies that, at least 35 days prior to the date of the scheduled protest deadline for this Application, each owner which Applicant was able to locate, not already leased or voluntarily pooled, will be provided with the well proposal and information required by Rule 530 and tendered a reasonable offer to lease (if an unleased mineral owner), or participate and bear costs associated with the drilling and completion of the Lynch 34-6-18 #2 well.

7. Applicant requests that a pooling order be entered as a result of this Application and that it be made effective as of the earlier of the date of this Application, or the date costs specified in Section 34-60-116(7)(b)(II), C.R.S., are first incurred for the drilling of the Lynch 34-6-18 #2 well.

8. The granting of this Application would be in accord with the Oil and Gas Conservation Act, found at Section 34-60-101, *et seq.*, C.R.S., and Commission rules.

9. The names and addresses of the interested parties (persons who own an interest in the mineral estate of the tracts to be pooled, except owners of overriding royalty interest) are attached hereto and marked Exhibit A. Applicant certifies that copies of this Application will be served on all locatable interested parties within seven (7) days of the date hereof, as required by Commission Rule 507.b(2), and that at least thirty (35) days prior to the date of the scheduled protest deadline for this Application, each such owner not already leased or voluntarily pooled will be offered the opportunity to lease, or to participate in the drilling of the respective wells, and will be provided with the information required by Rule 530.

WHEREFORE, Applicant respectfully requests that this matter be set for hearing, that notice be given as required by law and that upon such hearing this Commission enter its order:

A. Providing that the pooling order is made effective as of the date of this Application, or the date that the costs specified in Section 34-60-116(7)(b)(II), C.R.S., are first incurred for the drilling of the Applicant's proposed Lynch 34-6-18 #2 well on the Application Lands, whichever is earlier;

B. Providing that the interests of any owners, with whom the Applicant has been unable to secure a lease or other agreement to participate in the drilling of the Lynch 34-6-18 #2 well, are pooled by operation of statute, pursuant to Section 34-60-116(7), C.R.S., and made subject to the cost recovery provisions thereof; and

C. For such other findings and orders as the Commission may deem proper or advisable in the premises.

Dated this 16th day of July, 2015

Respectfully submitted,

WELBORN SULLIVAN MECK & TOOLEY, P.C.

By: 

Joseph C. Pierzchala
Chelsey J. Russell
Welborn Sullivan Meck & Tooley, P.C.
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303-830-2500
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Applicant's Address:

1801 Broadway, Suite 1000
Denver, CO 80202
Attn: Jared Rush, Senior Landman
Phone: 720-484-2354

VERIFICATION

STATE OF COLORADO)
) ss.
CITY & COUNTY OF DENVER)

Jared Rush, Senior Landman with Catamount Energy Partners LLC, upon oath deposes and says that he has read the foregoing Application and that the statements contained therein are true to the best of his knowledge, information and belief.

CATAMOUNT ENERGY PARTNERS LLC




Jared Rush, Senior Landman

Subscribed and sworn to before me this ___ day of July, 2015 by Jared Rush, Regional Landman for Catamount Energy Partners LLC.

Witness my hand and official seal.

SOPHIA M BEALL
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20104033021
MY COMMISSION EXPIRES AUGUST 24, 2018



Notary Public
My Commission Expires: August 24, 2018

EXHIBIT A

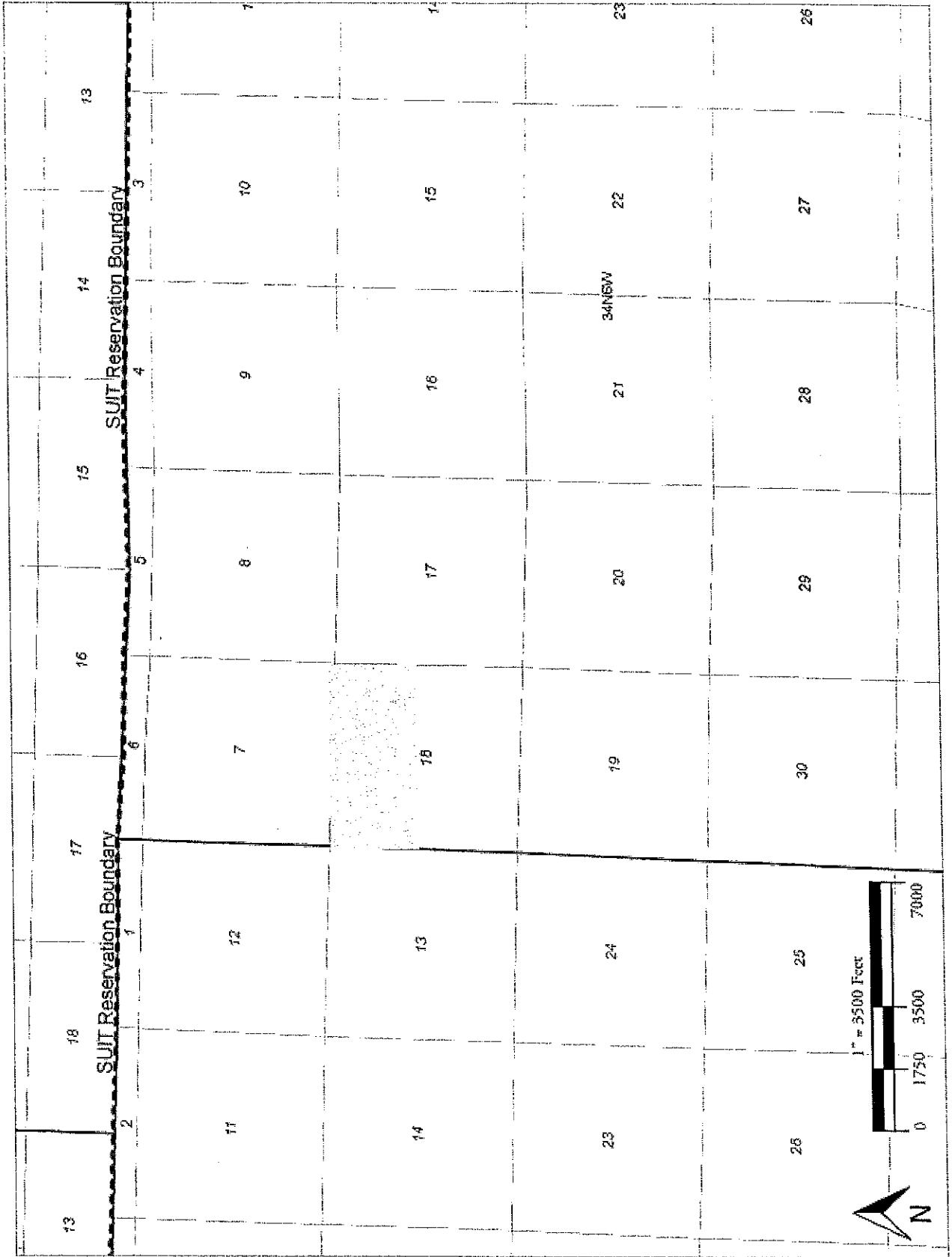
Interested Parties

Pat Gallagher Bureau of Land Management Colorado State Office 2850 Youngfield Street Lakewood, CO 80215-7093	Belmont Sister L.P. Bank of America, N.A. Agent P.O. Box 2546 Fort Worth, TX 76113	Kristin Dawn Baker Ashton P.O. Box 371 East Helena, MT 59634
R. S. Currens and Laura L. Currens, JT 10 Grassland Way Petaluma, CA	Kirk M. Oglesby, Trustee Trust Agreement dated 6/26/1980 Apparent heir of F. M. Oglesby 1250 E. 3rd Avenue Broomfield, CO 80020	Baker Alpard Minerals P.O. Box 12992 El Paso, TX 79913
Linda Louise Hickey 33 Toquam Road New Canaan, CT 06840- 3927	Henry Schneider and Bankers Trust Company Trustees for the Benefit of the Estate of Henry L. Moses, deceased c/o Deutsche Bank 60 Wall Street New York, NY 10005	John W. Hathoot dba Legacy Mineral Services 4340 Prentiss Drive, Yorba Linda, CA 92886
Linda Louise Curren 11104 Aqua Vista Street, Apt. 34 North Hollywood, CA 91602-3111	Bank of Oklahoma, N.A. of Tulsa County, Oklahoma (formerly National Bank of Tulsa), Trustee for John Brittain Robinett, Jr. P.O. Box 3499 Tulsa, OK 74101	Estate of William Strong cannot locate
Alfred W. Bessler, Irving Sitnik, Henry Schneider, Bankers Trust Company, Trustees for the benefit of Luch G. Moses c/o Deutsche Bank 60 Wall Street New York, NY 10005	Wm. W. McClure, Jr., as Trustee of the Trust 952 Piltower BLDG Tulsa, OK 74127	Ruth Lopez 613 Norgard Ct. Sacramento, CA 95833

<p>The Estate of Teresa W. Tatum c/o State National Bank 690 Sunland Park Dr. El Paso, TX 79912</p>	<p>Charles W. Harris, Ruth Sowards and Alva Jo Eaton, Trustees of the Paul L. Sisk and Helen I. Sisk Charitable Trust 5319 S Lewis Ave., Ste 207 Tulsa, OK 74105-6543</p>	<p>Gladys Peterson cannot locate</p>
<p>Bankers Trust Company, Trustee for the benefit of William L. Hernstadt c/o Deutsche Bank 60 Wall Street New York, NY 10005</p>	<p>The Tatum Living Trust dated 12/10/1996 Bank of America, N.A., Agent P.O. Box 2546 Fort Worth, TX 76113</p>	<p>Richard Pellascini and Linda Pellascini 8053 Washington Ave Sebastopol, CA 95472</p>
<p>David Keith Roberts P.O. Box 2203 Ruidoso, NM 88355</p>	<p>Leslie C. Tatum P.O. Box 7392 Norh Kansas City, MO 84116</p>	<p>Shriners Hospital for Crippled Children c/o Northern Trust PO Box 31356 Tampa, FL 33631-3356</p>
<p>BP America Production Company Amoco Production Company Attn: Emily Beard 737 North Eldridge Parkway, Room E3-12.173D Houston, Texas 77079</p>	<p>Neville G. Penrose, as Trustee of the Patricia Penrose Trust 500 West 7th Street, Suite 400 Ft. Worth, TX 76113</p>	<p>Father Flanagan's Boys Town 355 McBreen Cir Boys Town, NE 68010-7549</p>
<p>First Church of Christ Scientist 1415 Logan Street Denver, Co 80203</p>	<p>Robbye F. Baker 5124 Temple Ct El Paso, TX 79924-1223</p>	<p>Jan Tiura 900 Buena Vista ST PO Moss Beach, CA 94038-9618</p>
<p>Virginia Peterson 1228 Rossmoor Pkwy Apt 130 Walnut Creek, CA 94595-2575</p>	<p>Roberta Peterson 151 N 6th St Hillsboro, OR 97123</p>	<p>Maybelle Taylor 808 West Cummings St Henryetta, OK 74437</p>

<p>Arnold Peterson and Mary Peterson 700 E Gobbi St SPC 119 Ukiah, CA 95482-6200</p>	<p>Jennifer Palmer, Also known as Jennifer Marie Saunders Heir of Jill Danielson 5017 McCloskey Court Santa Rosa, CA 95409</p>	<p>Kendra Jauregui Heir of Jill Danielson 15 Bulrush Court American Canyon, CA 94503</p>
<p>Dolores Ledford P.O. Box 94 Point Arena, CA 95468</p>	<p>Ramona Vincent 4919 Rinwood Drive Santa Rosa, CA 94505</p>	<p>Clarence Giacomini Box 113 Point Arena, CA 95468</p>

Reference Map - N/2 S18U T34N R6W



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AFFIDAVIT OF MAILING

STATE OF COLORADO §
CITY AND COUNTY OF DENVER §

I, Joseph C. Pierzchala, of lawful age, and being first duly sworn upon my oath, state and declare:

That I am the attorney for Catamount Energy Partners LLC and that on or before July 17, 2015, I caused a copy of the attached Application to be deposited in the United States mail, postage prepaid, addressed to the parties listed on Exhibit A to the Application.




Joseph C. Pierzchala

Subscribed and sworn to before me July 20, 2015

Witness my hand and official seal.

MELISSA A. MORMAN
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 19894012434
MY COMMISSION EXPIRES AUGUST 29, 2017



Notary Public
My commission expires: 8/29/2017