

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 20U OF TOWNSHIP 34 NORTH, RANGE 6 WEST, N.M.P.M., LA PLATA COUNTY, COLORADO.

CAUSE NO.: 112 DOCKET NO.: 150900496 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 S 1/2 of Section 20U, 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 20U: S 1/2

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. 112-245, 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 Elsa 34-6-19 #1 well (API# 05-067-09922).

5. Applicant plans to drill and complete the Elsa 34-6-19 #2 well with an anticipated spud date in Third Quarter 2015, in the S½ of Section 20U, Township 34 North, Range 6 West, N.M.P.M. (S.U.L.), La Plata County, Colorado with a surface location of 1,303 feet FSL and 290 feet FEL in the E½SE¼ of Section 19U. 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 Elsa 34-6-19 #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 Elsa 34-6-19 #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 Elsa 34-6-19 #2 well on the Application Lands, whichever is earlier;

C. 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 Elsa 34-6-19 #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

D. 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.
Attorney for Applicant
1125 - 17th Street, Suite 2200
Denver, CO 80202
303-830-2500
jpierzchala@wsmtlaw.com
crussell@wsmtlaw.com

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.

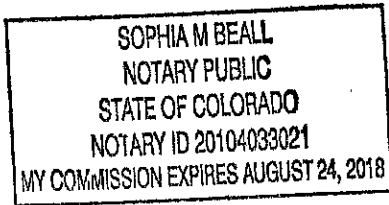
CATAMOUNT ENERGY PARTNERS LLC

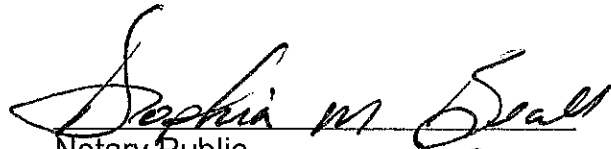


Jared Rush, Senior Landman

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.





Notary Public
My Commission Expires: August 24, 2018

Exhibit A

BP America Production Company
Amoco Production Company
Attn: Emily Beard
737 North Eldridge Parkway
Room E3-12.173D
Houston, TX 77079

Estate of Lorence L. Smith, dec
685 1/2 Browning
P.O. Box 1183
Ignacio, CO 81137

Cheryl M. Smith
P.O. Box 1183
Ignacio, CO 81137

Pat Gallagher
Bureau of Land Management
Colorado State Office
2850 Youngfield Street
Lakewood, CO 80215-7093

Cheryl M. Smith
P.O. Box 1183
Ignacio, CO 81137

Kenneth Smith
P.O. Box 635
Ignacio, CO 81137

Lois B. Moses
7115 Poppy Place NW
Albuquerque, NM 87121

William Smith
2109 50 Pristi Space CY
Johnstown, CO 80534

Lee Mack Smith
703 CR 516
Ignacio, CO 81137

Possible Heirs of R. D. Crowell:

Kenneth William Price aka Kenneth W. Price
3089 West Shore Dr.
Helena, MT 59602

Marilyn Adele Price Olson
aka Marilyn A. Olson
6644 N. Citrus Rd.
Waddell, AZ 85355

Others:

L. D. Kempton
Unable to Locate

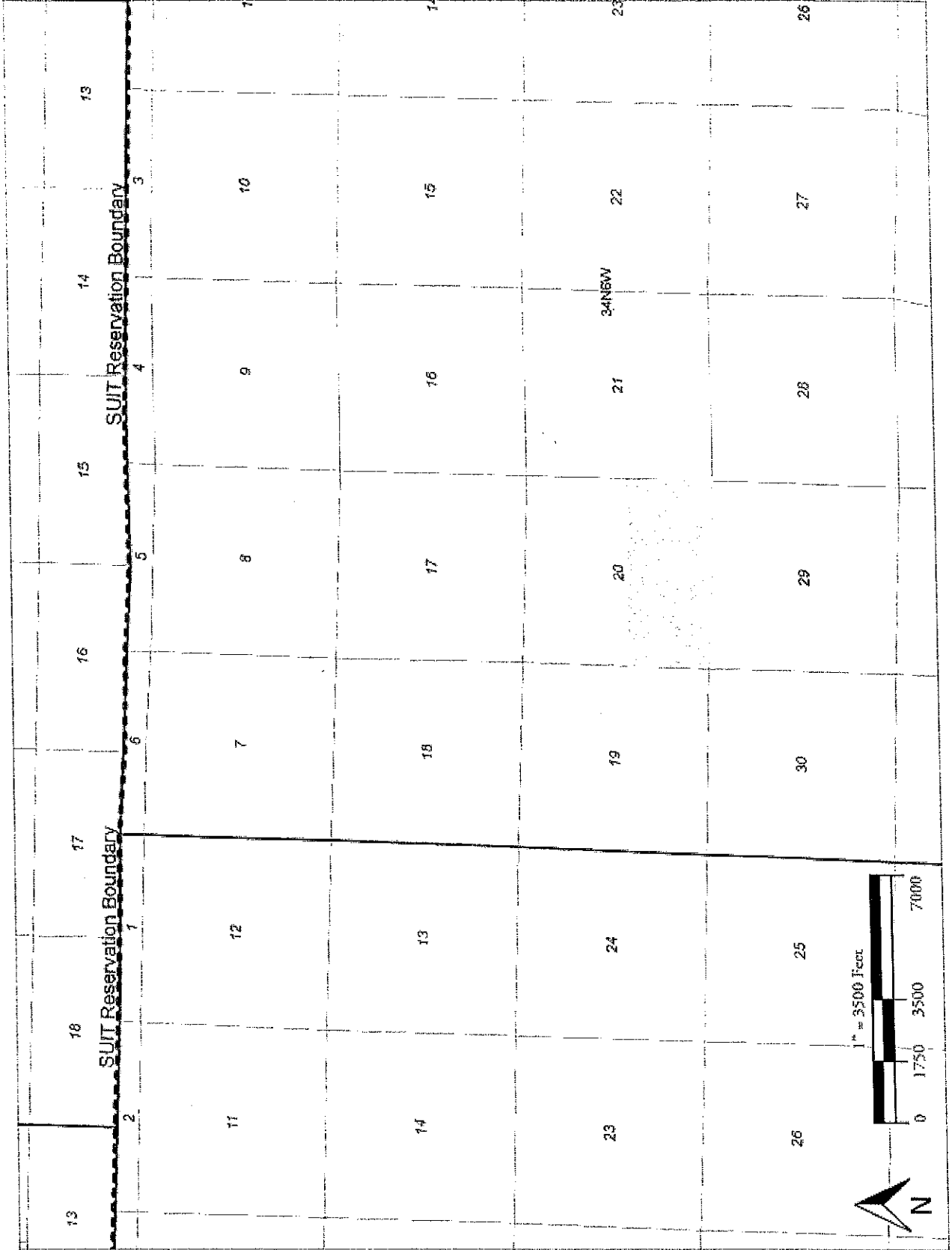
R.D. Crowell
Unable to Locate

LaFon Royalties LLC
1475 N. Ward Circle
Franktown, CO 80116

R.D. Hott Living Trust
P.O. Box 295
Pagosa Springs, CO 81147

R.D. Hott Living Trust
P.O. Box 2889
Pagosa Springs, CO 81147

Reference Map - S/2 S20U T34N R6W



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 20U)
OF TOWNSHIP 34 NORTH, RANGE 6 WEST,)
N.M.P.M., LA PLATA COUNTY, COLORADO.)

CAUSE NO.: 112

DOCKET NO.: 150900496

TYPE: POOLING

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:

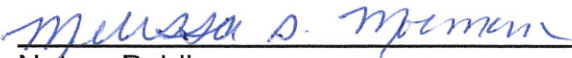
That I am the attorney for Catamount Energy Partners LLC and that on or before July 17, 2015, I caused a copy of the attached Application to be deposited in the United States mail, postage prepaid, addressed to the parties listed on Exhibit A to the Application.



Joseph C. Pierzchala

Subscribed and sworn to before me July 20, 2015

Witness my hand and official seal.



Notary Public
My commission expires: 8/29/2017

