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

IN THE MATTER OF THE APPLICATION)	Cause No. 112
OF CATAMOUNT ENERGY PARTNERS)	
LLC FOR AN ORDER AMENDING ORDER)	Docket NO. 170900611
NO. 112-157 TO ALLOW ADDITIONAL)	
WELLS IN TWO ESTABLISHED 320-ACRE)	Type: INCREASED DENSITY
DRILLING AND SPACING UNITS FOR THE)	
FRUITLAND COAL SEAMS COVERING)	
CERTAIN LANDS IN SECTION 27,)	
TOWNSHIP 33 NORTH, RANGE 8 WEST,)	
N.M.P.M., LA PLATA COUNTY,)	
COLORADO.)	

APPLICATION

Catamount Energy Partners LLC (Operator No. 10464) (“Applicant” or “Catamount”), 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”) for an order to amend Order No. 112-157, insofar and only insofar as it pertains to the application lands described below, to allow additional wells within two established 320-acre drilling and spacing units, and to establish well location rules applicable to the drilling of wells and producing of gas and associated hydrocarbons from the Fruitland Coal Seams covering certain lands in La Plata County, Colorado. In support of its Application, Applicant states as follows:

1. Applicant owns leasehold interests in the following lands (“Application Lands”):

Township 33 North, Range 8 West, N.M.P.M. (S.U.L)
Section 27: All

A reference map of the Application Lands is attached hereto.

2. On June 17, 1988, the Commission entered Order No. 112-60, which established 320-acre drilling and spacing units covering certain lands in La Plata County, Colorado, with the units consisting of the N½ and S½ or the E½ and W½ of each section with the permitted well located, when north of the north line of Township 32 North, in the NW¼ and SE¼ of the section, and south of the north line of Township 32 North, in the NE¼ and SW¼ of the section, and no closer than 990 feet to any outer boundary of the unit and no closer than 130 feet to any interior quarter section line for the production of gas from the Fruitland Coal Seams. The Application Lands are subject to this Order.

3. On August 15, 1988, the Commission entered Order No. 112-61, which amended parts of Order No. 112-60 and established additional rules for the production of coalbed methane. The Application Lands are subject to this Order.

4. On December 17, 1990, the Commission entered Order No. 112-157, which amended Order Nos. 112-60, 112-61, and 112-85 to allow an optional additional well (for a total of up to two wells) to be drilled for production of gas from the Fruitland Coal Seams within the established 320-acre drilling and spacing units with the permitted well to be located in any undrilled quarter section no closer than 990 feet from the boundaries of the quarter section, nor closer than 130 feet to any interior quarter section line. The Application Lands are subject to this Order.

5. The Fruitland Coal Seams are a common source of supply under the Application Lands, which are comprised of two stand-up 320-acre drilling and spacing units. There are several wells drilled within the Application Lands that are currently producing from the Fruitland Coal Seams and show that the geology and engineering characteristics of the Application Lands are similar to that of adjoining sections for which the Commission has approved the drilling of four (4) wells within each 320-acre drilling and spacing unit for the Fruitland Coal Seams. In addition, Applicant has drilled several wells in the vicinity of the Application Lands and asserts that the Application Lands share similar geologic and engineering characteristics. The results of Applicant's wells further support the Application's request for additional wells and modified setbacks for the established stand-up 320-acre drilling and spacing units.

6. To promote efficient drainage of the Fruitland Coal Seams within the Application Lands and to avoid waste, the Commission should enter an order that amends Order No. 112-157 as it pertains to the Application Lands to:

- a. allow an additional two (2) wells, for a total of up to four (4) vertical, directional, or horizontal wells, within each of the established stand-up 320-acre drilling and spacing units covering the Application Lands for production of gas and associated hydrocarbons from the Fruitland Coal Seams, with the surface location for the additional wells to be located at a legal location in the above-described drilling and spacing units or on adjacent lands; and
- b. require that the treated interval of each wellbore be located no closer than 660 feet from the unit boundary, with no interior quarter-section setbacks, unless an exception is granted by the Director.

7. Applicant maintains that the above-proposed additional wells within the established stand-up 320-acre drilling and spacing units and modified setbacks will allow efficient drainage of the Fruitland Coal Seams, will prevent waste, will protect correlative rights, and will assure the greatest ultimate recovery of gas and associated hydrocarbons from the Fruitland Coal Seams. The proposed additional wells will not render the established 320-acre drilling and spacing units smaller than the maximum

area that can be economically and efficiently drained by the proposed wells in each such drilling and spacing unit. Applicant further maintains that the proposed additional wells and reduced unit boundary setbacks will have no adverse effect on correlative rights of adjacent owners.

8. Applicant further requests that the Commission take administrative notice of the testimony and supporting exhibits supporting Order Nos. 112-81, 112-191, 112-190, and 112-195 which allow up to four (4) wells in each 320-acre drilling and spacing unit for production of gas from the Fruitland Coal Seams with the permitted well to be no closer than 660 feet from the unit boundary, with no interior quarter-section setbacks, for Sections 21-23, 26, 28, and 31-33, Township 33 North, Range 8 West, N.M.P.M. (S.U.L.), all of which adjoin the Application Lands.

9. Applicant states that four (4) wells in each of the established stand-up 320-acre drilling and spacing units within the Application Lands can be developed in a manner consistent with the protection of public health, safety, and welfare.

10. The names and addresses of the interested parties according to the information and belief of the Applicant are set forth in Exhibit A attached hereto and made a part hereof, and the undersigned certifies that copies of the original Application shall be served on each interested party as required by Rule 503.e.

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 consistent with Applicant's proposals as set forth above.

Dated this 13th day of July, 2017

Respectfully submitted,

WELBORN SULLIVAN MECK & TOOLEY, P.C.

By: 

Joseph C. Pierzchala
Geoffrey W. Storm
Welborn Sullivan Meck & Tooley, P.C.
Attorneys for Applicant
1125 - 17th Street, Suite 2200
Denver, CO 80202
303-830-2500

Applicant's Address:

1801 Broadway, Suite 1000
Denver, CO 80202
Attn: Denise Greer, Landman
Phone: 720-484-2351

VERIFICATION

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

Denise Greer, Landman with Catamount Energy Partners, LLC, upon oath deposes and says that she has read the foregoing Application and that the statements contained therein are true to the best of her knowledge, information and belief.

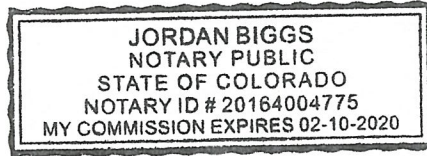
CATAMOUNT ENERGY PARTNERS, LLC

Denise R Greer

Denise Greer, Landman

Subscribed and sworn to before me this 18th day of July, 2017 by Denise Greer, Landman for Catamount Energy Partners, LLC

Witness my hand and official seal.



Jordan Biggs

Notary Public

My Commission Expires: 2-10-2020

EXHIBIT A

INTERESTED PARTIES

La Plata County Planning Department

Brenna Kampf
211 Rock Point Drive
Durango, CO 81122

Colorado Department of Public Health and Environment

Mark McMillan
4300 Cherry Creek Drive South
Denver, CO 80246-1500

Colorado Parks and Wildlife

Jon Holst
Southwest Region Office
415 Turner Dr.
Durango, CO 81303

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EXHIBIT A CONTINUED ON NEXT PAGE

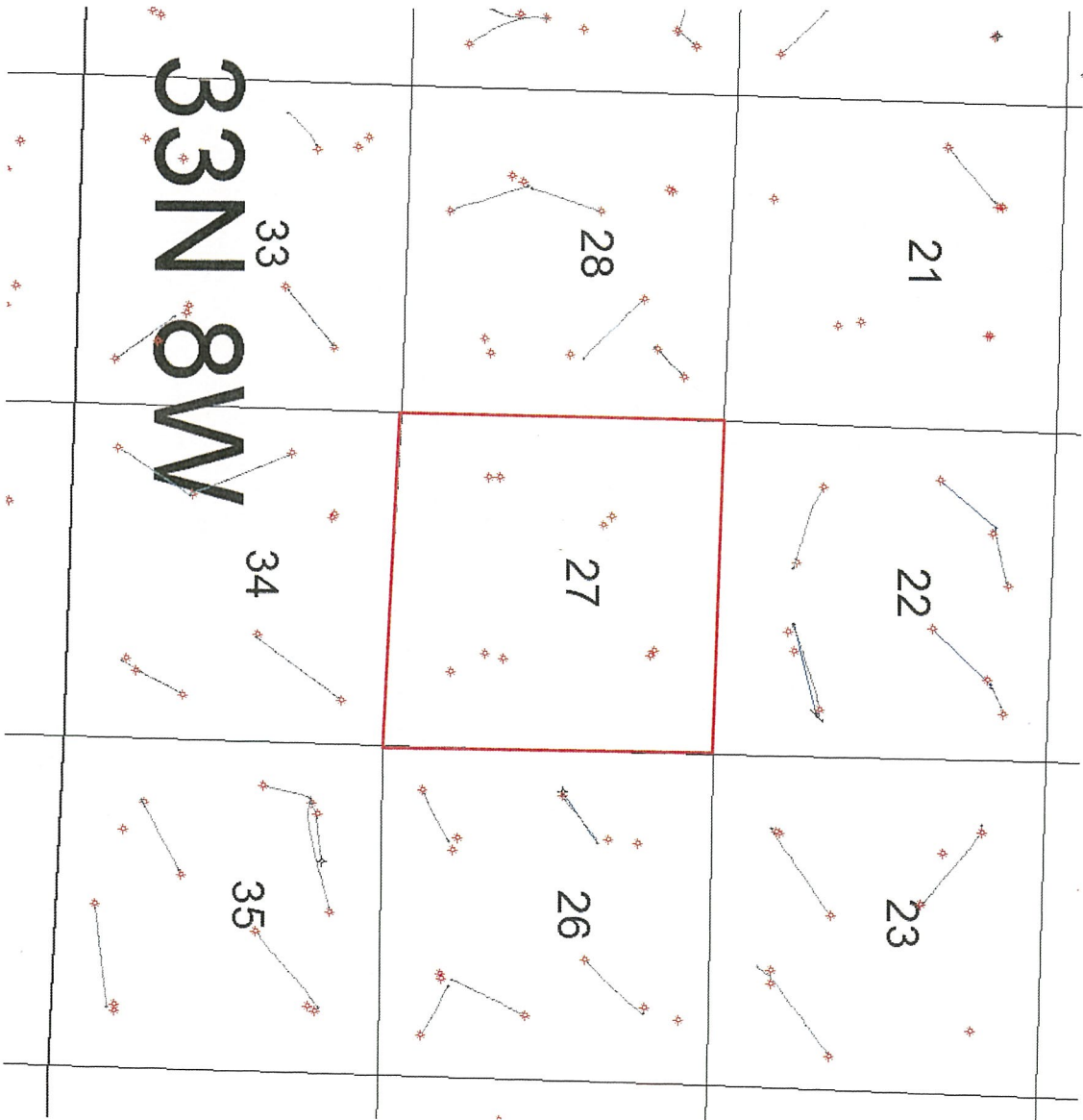
EXHIBIT A

INTERESTED PARTIES

Catamount Energy Partners LLC
Four Rivers Resources LLC
Red Willow Production Company
TH McElvain Oil & Gas LLP
Tamacam LLC
J & M Raymond Ltd.
Charles W. Gay
Lorrayn Gay Hacker
Leslie Carole Tatum
LHS, Smith & Smithm Ltd, LLP
Rock Creek Ranch I Ltd.
Patricia Schieffer Agency, Bank of America NA Agent
Tatum West Roberts
Tatum Living Trst dtd 12-10-96, Bank of America NA Agent
Southern Ute Indian Tribe
Black Hills Exploration & Production Inc.
Pablo Operating Company



Application Lands



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COLORADO.)	

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 20, 2017, I caused a copy of the attached Application to be deposited in the United States mail, postage prepaid, addressed to the parties on the Exhibit A to the Application.




 Joseph C. Pierzchala

Subscribed and sworn to before me July 25, 2017

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