

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

**APPLICATIONS OF COG OPERATING LLC FOR  
COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.**

**Case Nos. 24097-24100**

**COG'S CONSOLIDATED PRE-HEARING STATEMENT**

COG Operating LLC ("COG"), the applicant in these matters, submits this pre-hearing statement.

**APPEARANCES**

**APPLICANTS**

COG Operating LLC

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
pmvance@hollandhart.com

**OTHER PARTIES**

**ATTORNEY**

### COG's STATEMENT OF THE CASES

COG seeks orders pooling four standard horizontal well spacing units in the Wolfcamp formation underlying Sections 20 & 29, Township 24 South, Range 32 East, NMPM, Lea County, New Mexico as follows:

- Under Case 24097 COG seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a 320-acre horizontal well spacing unit comprised of the E2E2 of Sections 20 & 29 to be initially dedicated to the proposed **Azores Federal Com 701H** and **Azores Federal Com 702H** wells to be horizontally drilled from a surface location in the SE4 of Section 29, with first take points in the SE4SE4 (Unit P) of Section 29 and last take points in the NE4NE4 (Unit A) of Section 20.
- Under Case 24098 COG seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a 320-acre horizontal well spacing unit comprised of the W2E2 of Sections 20 & 29 to be initially dedicated to the proposed **Azores Federal Com 703H** and **Azores Federal Com 707H** wells to be horizontally drilled from a surface location in the SE4 of Section 29, with first take points in the SW4SE4 (Unit O) of Section 29 and last take points in the NW4NE4 (Unit B) of Section 20.
- Under Case 24099 COG seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a 320-acre horizontal well spacing unit comprised of the E2W2 of Sections 20 & 29 to be initially dedicated to the proposed **Azores Federal Com 704H** and **Azores Federal Com 705H** wells to be horizontally drilled from a surface location in the SW4 of Section 29, with first take points in the SE4SW4 (Unit N) of Section 29 and last take points in the NE4NW4 (Unit C) of Section 20.

- Under **Case 24100** COG seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a 320-acre horizontal well spacing unit comprised of the W2W2 of Sections 20 & 29 to be initially dedicated to the proposed **Azores Federal Com 706H** and **Azores Federal Com 708H** wells to be horizontally drilled from a surface location in the SW4 of Section 29, with first take points in the SW4SW4 (Unit M) of Section 29 and last take points in the NW4NW4 (Unit D) of Section 20.

COG has undertaken good faith efforts but been unable to obtain voluntary joinder in the development of this acreage from the mineral owners that remain to be pooled.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Michael Potts, Landman	Self-Affirmed Statement	Approx. 6
Ben Breyman, Geologist	Self-Affirmed Statement	Approx. 4

#### **PROCEDURAL MATTERS**

COG seeks to consolidate these matters for hearing and intends to present them by self-affirmed statement if they remain unopposed at the time of the hearing.

Respectfully submitted,

HOLLAND & HART LLP

By:   
\_\_\_\_\_  
Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, NM 87504  
505-988-4421  
505-983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
pmvance@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS  
  
Action 298116

QUESTIONS

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:  229137
	Action Number:  298116
	Action Type:  [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.