

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

**APPLICATIONS OF COG OPERATING LLC
FOR COMPULSORY POOLING AND APPROVAL
OF NON-STANDARD SPACING UNITS,
LEA COUNTY, NEW MEXICO**

**CASE NOS. 24059
24060**

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

CASE NO. 24061

CONSOLIDATED PRE-HEARING STATEMENT

COG Operating LLC (“COG” or “Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

COG Operating LLC

ATTORNEYS

Dana S. Hardy
Jaclyn McLean
Hinkle Shanor LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
dhardy@hinklelawfirm.com
jmclena@hinklelawfirm.com

INTERESTED PARTIES

None.

ATTORNEYS

STATEMENT OF THE CASES

In **Case No. 24059**, COG applies for an order: (1) establishing a 1280-acre, more or less, non-standard horizontal spacing unit comprised of Sections 28 and 33, Township 25 South, Range 35 East, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp formation underlying the Unit. The Unit will be dedicated to the following proposed wells:

Akubra Federal Com 701H well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 28; **Akubra Federal Com 702H** well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 28; **Akubra Federal Com 703H** well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 4 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 28; **Akubra Federal Com 801H** well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 28; and **Akubra Federal Com 802H** well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 4 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 28.

In **Case No. 24060**, COG applies for an order: (1) establishing a 960-acre, more or less, non-standard horizontal spacing unit comprised of the W/2 and W/2 E/2 of Sections 28 and 33, Township 25 South, Range 35 East, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Bone Spring formation underlying the Unit. The Unit will be dedicated to the following proposed wells: **Akubra Federal Com 601H**, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 28; and **Akubra Federal Com 602H**, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 4 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 28.

In **Case No. 24061**, COG seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Sections 28 and 33, Township 25 South, Range 35 East, Lea County, New Mexico. Applicant seeks to dedicate the Unit to the **Akubra Federal Com 603H** well, which will

be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 4 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 28.

The completed intervals of the Wells will be orthodox. Also to be considered will be the cost of drilling and completing the Wells and the allocation of the cost, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The Wells are located approximately 9.5 miles west of Jal, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Blair Brummell	Land Negotiator	Affidavit	Approx. 5
Laura Vargas	Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Applicant intends to consolidate these cases for hearing and will present these matters by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn McLean

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

Counsel 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 302586

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 302586
	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.