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. 24225-24226

COG'S CONSOLIDATED PRE-HEARING STATEMENT

COG Operating LLC ("COG" or "Applicant"), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

COG Operating LLC ("COG")

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
agrankin@hollandhart.com
pmvance@hollandhart.com

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, COG seeks orders pooling all uncommitted interests in the Wolfcamp formation (Diamondtail; Wolfcamp [17645]) underlying the referenced acreage as follows:

• Under Case No. 24225, COG seeks to pool the uncommitted interests in a standard 479.61-acre, more or less, horizontal well spacing unit comprised of Lot 1, SE/4 NE/4, and the E/2 SE/4 of irregular Section 2 (E/2 E/2 equivalent) and the E/2 E/2 of Sections

11 and 14, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico and initially dedicate this Wolfcamp spacing unit to the proposed **Redtail Federal Com 701H** well, to be horizontally drilled from a surface location in the NE/4 of irregular Section 2, with a first take point in Lot 1 of irregular Section 2 and the last take point in the SE/4 SE/4 (Unit P) of Section 14.

• Under Case No. 24226, COG seeks to pool the uncommitted interests in a standard 479.62-acre, more or less, horizontal well spacing unit comprised of Lot 2, SW/4 NE/4, W/2 SE/4 of irregular Section 2 (W/2 E/2 equivalent) and the W/2 E/2 of Sections 11 and 14, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico and initially dedicate this Wolfcamp spacing unit to the proposed Redtail Federal Com 703H well, to be horizontally drilled from a surface location in the NE/4 of Section 2, with a first take point in Lot 2 of irregular Section 2 and the last take point in the SW/4 SE/4 (Unit O) of Section 14.

The completed interval for each of the wells will comply with statewide setbacks for oil wells. Applicant has reached a voluntary agreement with all working interest owners in this proposed unit but seeks a pooling order for certain non-cost-bearing interest owners, including overriding royalty interest owners and record title owners, who have yet to execute the necessary federal and state communitization agreements.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Michael Monju, Landman	Self-Affirmed Statement	Approx. 3
Ben Breyman, Geologist	Self-Affirmed Statement	Approx. 3

PROCEDURAL MATTERS

COG requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of 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

agrankin@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

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 323278

QUESTIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	323278
	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.	