

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

**APPLICATION OF COG OPERATING LLC
FOR COMPULSORY POOLING AND APPROVAL
OF NON-STANDARD SPACING UNIT,
LEA COUNTY, NEW MEXICO.**

CASE NO. 24888

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 M. McLean
Hinkle Shanor LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com

INTERESTED PARTY

Avant Operating, LLC

ATTORNEYS

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Modrall, Sperling, Roehl, Harris & Sisk,
P.A.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
deana.bennett@modrall.com
earl.debrine@modrall.com
yarithza.pena@modrall.com

STATEMENT OF THE CASE

COG applies for an order: (1) establishing a 1,280-acre, more or less, non-standard, horizontal spacing unit comprised of Sections 26 and 35, Township 20 South, Range 33 East, Lea

County, New Mexico (“Unit”); and (2) pooling all uncommitted interests in the Bone Spring formation underlying the Unit. COG seeks to dedicate the Unit to the following proposed wells (“Wells”):

- a. The **Ore Digger Federal 501H** and **Ore Digger Federal 601H** wells, which will produce from a first take point in the SW/4 SW/4 (Unit M) of Section 35 to a last take point in the NW/4 NW/4 (Unit D) of Section 26;
- b. The **Ore Digger Federal 502H** and **Ore Digger Federal 602H** wells, which will produce from a first take point in the SE/4 SW/4 (Unit N) of Section 35 to a last take point in the in the NE/4 NW/4 (Unit C) of Section 26;
- c. The **Ore Digger Federal 503H** and **Ore Digger Federal 603H** wells, which will produce from a first take point in the SW/4 SE/4 (Unit O) of Section 35 to a last take point in the NW/4 NE/4 (Unit B) of Section 26; and
- d. The **Ore Digger Federal 504H** and **Ore Digger Federal 604H** wells, which will produce from a first take point in the SE/4 SE/4 (Unit P) of Section 35 to a last take point in the NE/4 NE/4 (Unit A) of Section 26.

The completed intervals of the Wells will be orthodox. Applicant requests approval of a non-standard horizontal spacing unit to allow for the consolidation of surface facilities and thereby prevent surface, environmental, and economic waste. Also to be considered will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Michael Monju	Landman	Affidavit	Approx. 7
William Schellenbach	Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Applicant will present this case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. 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

CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2025, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
deana.bennett@modrall.com
earl.debrine@modrall.com
yarithza.pena@modrall.com
Attorneys for Avant Operating, LLC

/s/ Dana S. Hardy
Dana S. Hardy

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 427921

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 427921
	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.