

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

**APPLICATIONS OF CIMAREX ENERGY CO.
FOR APPROVAL OF A NON-STANDARD UNIT,
COMPULSORY POOLING, AND, TO THE EXTENT
NECESSARY, APPROVAL OF AN OVERLAPPING
SPACING UNIT, EDDY COUNTY, NEW MEXICO**

CASE No. 25091, 25259

CONSOLIDATED PRE-HEARING STATEMENT

This Consolidated Pre-Hearing Statement is submitted for the above-referenced cases pursuant to the rules of the Oil Conservation Division. This application was filed on behalf of Cimarex Energy Co. Cimarex Energy Co. of Colorado is a subsidiary of Cimarex Energy Co., which recently changed its name to Coterra Energy Operating Co. Cimarex Energy Co. of Colorado will be the operator of these wells.

APPEARANCES

APPLICANT

Cimarex Energy Co. of Colorado

ATTORNEY

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

OTHER PARTIES

MRC Permian

ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504

505-982-2043
jamesbruc@aol.com

ConocoPhillips Company

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrankin@hollandhart.com
pmvance@hollandhart.com

XTO Permian Operating LLC

Miguel A. Suazo
James P. Parrot
James L. Everhart 5
00 Don Gaspar Ave.
Santa Fe, NM 87505
(505) 946-2090
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jeverhart@bwenergylaw.com

STATEMENT OF CASES

APPLICANT:

In **Case No. 25091**, Cimarex seeks an order from the Division approving a non-standard spacing unit and pooling all uncommitted interests within a 1280-acre, more or less, Wolfcamp horizontal spacing unit comprised of Sections 28 and 29, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico, in the Purple Sage Wolfcamp Gas Pool (Code 98220). This spacing unit will be dedicated to the following wells: **Laguna Grande Fed Com 29-28 #9H and the Laguna Grande Fed Com 29-28 #10H** wells with proposed first take points in the NW/4 NW/4 (Unit D) of Section 29 and proposed bottom hole locations in the NE/4 NE/4 (Unit A) of Section 28; **Laguna Grande Fed Com 29-28 #11H and the Laguna Grande Fed Com 29-28 #12H** wells with proposed first take points in the SW/4 NW/4 (Unit E) of Section 29 and proposed bottom hole locations in the SE/4 NE/4 (Unit H) of Section 28; **Laguna Grande Fed Com 29-28 #13H and the Laguna Grande Fed Com 29-28 #14H** wells with proposed first take points in the NW/4 SW/4 (Unit L) of Section 29 and proposed bottom hole locations in the NE/4 SE/4 (Unit I) of Section 28; and **Laguna Grande Fed Com 29-28 #15H and the Laguna Grande Fed Com 29-28 #16H** wells with proposed first take points in the SW/4 SW/4 (Unit M) of Section 29 and proposed bottom hole locations in the SE/4 SE/4 (Unit P) of Section 28. The wells will be drilled at orthodox locations. Applicant also seeks, to the extent necessary, approval of an overlapping spacing unit. The proposed horizontal spacing unit will partially overlap with a 320-acre Wolfcamp spacing unit comprised of the E/2 of Section 29, dedicated to Cimarex Energy Co. of

Colorado's Laguna Grande Unit 7H well (API 30-015-42739). Also to be considered will be the cost of drilling, completing, and equipping said wells, the allocation of these costs as well as the actual operating costs and charges for supervision while drilling and after completion, designation of Cimarex Energy Co. as operator of the wells, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 5 miles southeast of Loving, New Mexico.

In **Case No. 25259, Cimarex Application of Cimarex Energy Co. for approval of a non-standard spacing unit, compulsory pooling, and, to the extent necessary, approval of an overlapping spacing unit Eddy County, New Mexico.** Applicant seeks an order from the Division approving a non-standard spacing unit and pooling all uncommitted interests within a 1280-acre, more or less, Bone Spring horizontal spacing unit comprised of Sections 28 and 29, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico in the Laguna Salado; Bone Spring Pool (Code 96721) and/or the Laguna Salado; Bone Spring, South Pool (Code 96857). This spacing unit will be dedicated to the following wells: **Laguna Grande Fed Com 29-28 #1H** and the **Laguna Grande Fed Com 29-28 #2H** wells with proposed first take points in the NW/4 NW/4 (Unit D) of Section 29 and proposed bottom hole locations in the NE/4 NE/4 (Unit A) of Section 28; **Laguna Grande Fed Com 29-28 #3H** and the **Laguna Grande Fed Com 29-28 #4H** wells with proposed first take points in the SW/4 NW/4 (Unit E) of Section 29 and proposed bottom hole locations in the SE/4 NE/4 (Unit H) of Section 28; **Laguna Grande Fed Com 29-28 #5H** and the **Laguna Grande Fed Com 29-28 #6H** well with proposed first take points in the NW/4 SW/4 (Unit L) of Section 29 and proposed bottom hole locations in the NE/4 SE/4 (Unit I) of Section 28; and **Laguna Grande Fed Com 29-28 #7H** and the **Laguna Grande Fed Com 29-28 #8H** wells with proposed first take points in the SW/4 SW/4 (Unit M) of Section 29 and proposed bottom hole locations in the SE/4 SE/4 (Unit P) of Section 28. The wells will be drilled at orthodox locations. Applicant also seeks, to the extent necessary, approval of an overlapping spacing unit. The proposed horizontal spacing unit will partially overlap with the following existing Bone Spring spacing units in the Laguna Salado; Bone Spring, South Pool (Code 96857):

- A 120-acre spacing unit comprised of the N/2NW/4 and the NW/4NE/4 of Section 28, dedicated to OXY USA, Inc.'s Cypress 28 Federal #3H well (API 30-015-38287);
- A 120-acre spacing unit comprised of the S/2NW/4 and the SW/4NE/4 of Section 28, dedicated to OXY USA, Inc.'s Cypress 28 Federal #4H well (API 30-015-39330);
- A 120-acre spacing unit comprised of the N/2SW/4 and the NW/4SE/4 of Section 28, dedicated to OXY USA, Inc.'s Cypress 28 Federal #2H well (API 30-015-37331); and
- A 120-acre spacing unit comprised of the S/2SW/4 and the SW/4SE/4 of Section 28, dedicated to OXY USA, Inc.'s Cypress 28 Federal #1H well (API 30-015-37249).

Also to be considered will be the cost of drilling, completing, and equipping said wells, the allocation of these costs as well as the actual operating costs and charges for supervision while drilling and after completion, designation of Cimarex Energy Co. as operator of the wells, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 5 miles southeast of Loving, New Mexico.

PROPOSED EVIDENCE**APPLICANT:**

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Dylan Park	Approx. 10 minutes	Approx. 8
Geologist: Cahill Kelleghan	Approx. 10 minutes	Approx. 5
Engineer: Yury Golchenko	Approx. 10 minutes	Approx. 3

PROCEDURAL ISSUES

Cimarex intends to consolidate these cases for presentation by affidavit if there is no opposition to these applications.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: Deana M. Bennett

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

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
505-982-2043
jamesbruc@aol.com
Attorney for MRC Permian

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com
Attorneys for ConocoPhillips Company

Miguel A. Suazo
James P. Parrot
James L. Everhart 5
500 Don Gaspar Ave.
Santa Fe, NM 87505
(505) 946-2090
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jeverhart@bwenergylaw.com
Attorneys for XTO Permian Operating LLC

By: Deana M. Bennett
Deana M. Bennett

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 457733

QUESTIONS

Operator: Coterra Energy Operating Co. 6001 Deauville Blvd Midland, TX 79706	OGRID: 215099
	Action Number: 457733
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	3
Testimony time (in minutes)	Not answered.