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

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

CASE NO. 15063

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by COG Operating LLC ("COG"), as required by NMAC 19.15.4.13.B.

	APPEARANCES	130 [[
APPLICANT	ATTORNEY	12	A
COG Operating LLC One Concho Center 600 W. Illinois Avenue Midland, Texas 79701	Michael H. Feldewert Adam G. Rankin Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-22 (505) 988-4421 (505) 983-6043 Facsimile	T = 0	D OCD

STATEMENT OF THE CASE

COG seeks an order from the Division (1) creating a non-standard 160-acre spacing and proration unit comprised of the W/2 E/2 of Section 18, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all mineral interests in the Bone Springs formation, Red Hills; Lower Bone Spring Pool, underlying this acreage. COG proposes to dedicate the above-referenced spacing and proration unit as the project area for its Sebastian Federal Com 3H Well, which will be horizontally drilled from a surface location in the NW/4NE/4 of Section 18 (Unit B) to a standard

bottom hole location in the SW/4SE/4 of Section 18 (Unit O). The completed interval for this well will be in the W/2E/2 of Section 18 and remain within the 330-foot standard offset required by the Division's rules.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Mike Wallace, Landman	Approx. 10 minutes	Approx. 5
David DaGian, Geologist	Approx. 10 minutes	Approx. 4

PROCEDURAL MATTERS

This matter can be consolidated with Case No. 15064 for purposes of hearing efficiency.

Respectfully submitted,

HOLLAND & HART, LLP

Michael H. Feldewert

Adam G. Rankin

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

 $\underline{mfeldewert@hollandhart.com}$

agrankin@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC