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, EDDY COUNTY, NEW MEXICO.

CASE NOS. 15693 and 15694

COG's PRE-HEARING STATEMENT

COG Operating LLC, the applicant in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

COG Operating LLC One Concho Center 600 W. Illinois Avenue Midland, Texas 79701

ATTORNEY

Michael H. Feldewert, Esq. Jordan L. Kessler, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile

APPLICANT'S STATEMENT OF CASE

In Case No. 15693, COG Operating LLC seeks an order (1) creating a 454.63-acre, more or less, spacing and proration unit comprised of the E/2 W/2 and Lot 1, Lot 2, Lot 3, and Lot 4 (forming the W/2 W/2) of irregular Section 30 and the N/E NW/4 and Lot 1, Lot 2, and Lot 3 of irregular Section 31 (forming the W/2 NW/4 and SE/4 NW/4), Township 26 South, Range 29 East, NMPM, Eddy County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp Formation. Said non-standard unit is to be dedicated to applicant's proposed Copperhead Fee A No. 4H Well, which will be horizontally drilled from a surface location in

the SE/4 NW/4 (Lot 3) of irregular Section 31 to a standard bottomhole location in the NE/4 NW/4 (Unit C) of Section 30. Section 31 is an irregular section which borders the state of Texas. The completed interval for this well will remain within the 330-foot standard offset required by the Special Rules for the Purple Sage-Wolfcamp Gas Pool in Division Order No. R-14262.

In Case No. 15694, COG seeks an order (1) creating a non-standard 226.34-acre, more or less, spacing and proration unit comprised of the W/2 E/2 of Section 30 and the NW/4 NE/4 and Lot 6 of irregular Section 31, Township 26 South, Range 29 East, NMPM, Eddy County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp Formation. COG has requested approval of a non-standard spacing unit in the Purple Sage pool by administrative application. Said non-standard unit is to be dedicated to applicant's proposed Copperhead 31 Federal Com No. 21H, which will be horizontally drilled from a surface location in the SW/4 NE/4 (Lot 6) of irregular Section 31 to a standard bottomhole location in the NW/4 NE/4 (Unit B) of Section 30. Section 31 is an irregular section which borders the state of Texas. The completed interval for this well will also remain within the 330-foot standard offset required by the Special Rules for the Purple Sage-Wolfcamp Gas Pool in Division Order No. R-14262

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise Ashley Roush – Landman	Approx. 15	Approx. 8

PROCEDURAL MATTERS

COG respectfully requests that cases 15693 and 15694 be consolidated for hearing.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert
Jordan L. Kessler
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
jlkessler@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC