



MODRALL SPERLING

L A W Y E R S

July 19, 2018

Via E-Mail: leonard.lowe@state.nm.us

Leonard Lowe
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Earl E. DeBrine, Jr.
505.848.1810
Fax: 505.848.1891
edebrine@modrall.com

**Re: No. 16293 - CIMAREX ENERGY CO. OF COLORADO
FOR A NON-STANDARD SPACING AND PRORATION
UNIT AND COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

Dear Mr. Lowe:

Transmitted herewith is a copy of Cimarex's Pre-Hearing Statement for the **Dos Equis 11-14 Federal Com 4H** well. I am also sending three copies of Cimarex's Pre-Hearing Statement to you today by U.S. mail.

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,

Earl E. DeBrine, Jr.

EED/kta/W3226133.DOC

Enclosures

cc w/encl. (via email): Will Jones (WilliamV.Jones@state.nm.us)
Ocean Munds-Dry (omundsdry@concho.com)
William F. Carr (wcarr@concho.com)
Elizabeth A. Ryan (eryan@concho.com)
Jennifer L. Bradfute (Jennifer.bradfute@modall.com)

Modrall Sperling
Roehl Harris & Sisk
P.A.

Bank of America
Centre
500 Fourth Street
NW
Suite 1000
Albuquerque,
New Mexico 87102

PO Box 2168
Albuquerque,
New Mexico
87103-2168

Tel: 505 848 1800

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

**CIMAREX ENERGY CO. OF
COLORADO FOR A NON-STANDARD
SPACING AND PRORATION UNIT
AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16293

CIMAREX'S PRE-HEARING STATEMENT

Cimarex Energy Co. of Colorado ("Cimarex") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Cimarex Energy Co. of Colorado

ATTORNEY

Earl E. DeBrine, Jr.
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
edebrine@modrall.com
jl@modrall.com

OPPONENT

COG Operating LLC

Ocean Munds-Dry
William F. Carr
Elizabeth A. Ryan
COG OPERATING LLC
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-0000
omundsdry@concho.com
wcarr@concho.com
eryan@concho.com

STATEMENT OF CASE

In Case No. 16293, Applicant seeks an order from the Division: (1) creating a non-standard 160-acre, more or less, oil spacing and proration unit in the Bone Spring formation, comprised of the W/4 of Sections 11 and 14, Township 24 South, Range 27 East, NMPM, Lea County, New Mexico; and, (2) pooling all mineral interests in the Bone Spring formation underlying this proposed non-standard spacing and proration unit. This proposed non-standard spacing and proration unit will be the project area for the **Dos Equis 11-14 Federal Com 4H well**, to be horizontally drilled. The producing area for this well will be orthodox. Also to be considered will be the cost of drilling and completing said well, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Cimarex as operator of the well, and a 200% charge for risk involved in drilling said well.

PROPOSED EVIDENCE

CIMAREX:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Cody Elliott – Landman	Approx. 20	Approx. 6
Lauren Copley – Geologist	Approx. 15	Approx. 4
Adam Meeks – Petroleum Engineer	Approx. 15	Approx. 4

Respectfully submitted,

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

By: 

Earl E. DeBrine, Jr.

Attorneys for Cimarex Energy Co. of Colorado

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

edebrine@modrall.com

jlb@modrall.com