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 NOS. 16219, 16220

COG OPERATING LLC'S PRE-HEARING STATEMENT

COG Operating LLC ("COG") (OGRID No. 229137) submits the following Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

COG Operating LLC

ATTORNEY

Michael H. Feldewert, Esq. Jordan L. Kessler, Esq. Julia Broggi, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com ilkessler@hollandhart.com jbroggi@hollandhart.com

APPLICANT'S STATEMENT OF CASES

In Case No. 16219, COG seeks an order creating a 320-acre, more or less, spacing and proration unit comprised of the E/2 W/2 of Section 30 and the E/2 W/2 of Section 31 Township 24 South, Range 35 East, NMPM, Lea County, New Mexico, and pooling all uncommitted interests in the WC-025 G-09 S243532M; Wolfbone Pool (98098). COG proposes to dedicate

the above-referenced spacing and proration unit as the project area for its proposed **Fascinator Fed Com No. 601H Well, Fascinator Fed Com No. 602H Well, Fascinator Fed Com No.**701H Well, **Fascinator Fed Com No. 702H Well,** and **Fascinator Fed Com No. 703H Well** which will be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 30 to bottom hole locations in the SE/4 SW/4 (Unit N) of Section 31. The proposed **Fascinator Fed Com No. 702H Well** and **Fascinator Fed Com No. 703H Well** are unorthodox, and COG has separately sought administrative approval.

In Case No. 16220, COG seeks an order creating a 322.52-acre, more or less, spacing and proration unit comprised of Lots 1-4 of Section 30 and Lots 1-4 of Section 31 Township 24

South, Range 35 East, NMPM, Lea County, New Mexico and pooling all uncommitted interests in the WC-025 G-09 S243532M; Wolfbone Pool (98098). COG proposes to dedicate the above-referenced spacing and proration unit as the project area for its proposed Fascinator Fed Com No. 603H Well, Fascinator Fed Com No. 604H Well, Fascinator Fed Com No. 704H Well, Fascinator Fed Com No. 705H Well, and Fascinator Fed Com No. 706H Well, which will be horizontally drilled from a surface location in the NW/4 NW/4 (Lot 1) of Section 30 to bottom hole locations in the SW/4 SW/4 (Lot 4) of Section 31. The proposed Fascinator Fed Com No. 704H Well is unorthodox, and COG has separately sought administrative approval.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Matt Solomon – Landman	Approx. 10	Approx. 5
Henry Zollinger – Geologist	Approx. 10	Approx. 4

PROCEDURAL MATTERS

COG requests that Case Nos. 16219 and 16220 be consolidated for hearing.

Respectfully submitted,

HOLLAND & HART LLP

By:

Michael H. Feldewert

Jordan L. Kessler

Julia Broggi

P.O. Box 2208

Santa Fe, NM 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

jlkessler@hollandhart.com

jbroggi@hollandhart.com

ATTORNEYS FOR COG OPERATING, LLC

11155446_1