

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

**APPLICATION OF COG OPERATING LLC
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

AUG 21 2018 AM 08:24

CASE NO. 16319

AMENDED PRE-HEARING STATEMENT OF COG OPERATING LLC

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 OF THE PARTIES:

APPLICANT:

COG Operating LLC
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ATTORNEYS:

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OPPOSING:

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STATEMENT OF THE CASE

Applicant in the above-styled cause seeks an order (1) creating a 320-acre, more or less, spacing and proration unit comprised of SE/4 of Section 18 and NE/4 of Section 19, Township 24 South, Range 35 East, N.M.P.M., Lea County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp Formation, WC-025 G-09 S243532M; Wolfbone Pool [98098]. COG (OGRID No. 229137) is a working interest owner in the proposed horizontal spacing and proration unit and has the right to drill a well thereon. COG proposes to dedicate the above-referenced spacing and proration unit to the below-described wells: **Snapback Fee 601H Well**, to be drilled horizontally from a surface location in NE/4SE/4 (Unit I) of Section 18 to a bottom hole location in SE/4NE/4 (Unit H) of Section 19. This well location is unorthodox because the completed interval will be within 330 feet from the outer boundary of the horizontal spacing unit, and COG will be seeking administrative approval of a non-standard location. **Snapback Fee 602H Well, Snapback Fee 701H Well and Snapback Fee 702H Well**, to be drilled horizontally from surface locations in NE/4SE/4 (Unit I) of Section 18 to bottom hole locations in SE/4NE/4 (Unit H) of Section 19, which will remain within the 330-foot offset as required by the Statewide rules for oil wells. **Snapback Fee 703H Well and Snapback Fee 704H Well**, to be drilled horizontally from surface locations in NW/4SE/4 (Unit J) of Section 18 to bottom hole locations in SW/4NE/4 (Unit G) of Section 19, which will remain within the 330-foot offset as required by the Statewide rules for oil wells. **Snapback Fee 603H Well**, to be drilled horizontally from a surface location in NW/4SE/4 (Unit J) of Section 18 to a bottom hole location in SW/4NE/4 (Unit G) of Section 19. This well location is unorthodox because the completed interval will be within 330 feet from the outer boundary of the horizontal spacing unit, and COG will be seeking administrative approval of a non-standard location. The proposed

horizontal spacing unit is comprised of the SE/4 Section 18 and the NE/4 Section 19, Township 24 South, Range 35 East, N.M.P.M., Lea County, New Mexico. COG has sought in good faith and been unable to obtain voluntary agreement for the development of these lands from all of the working interest owners in the subject spacing unit. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights. Because the proposed wells will be simultaneously drilled and completed, COG requests an extension of the 120-day time period to drill and complete a well provided by the standard pooling order. In order to permit COG to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this non-standard spacing unit should be pooled, and COG Operating LLC should be designated the operator of the proposed horizontal wells and spacing unit.

PROPOSED EVIDENCE

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Matt Solomon, Landman	45	Approx. 8
Matt Fisher, Geologist	45	Approx. 8
Parker Simmons, Engineer	45	Approx. 5

PROCEDURAL MATTERS

COG requests that the following cases 16316, 16317, 16318, 16319 and 16320 be consolidated for hearing.

Respectfully submitted,

COG OPERATING LLC




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ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2018, I served a copy of the foregoing document to
the following counsel of record via Electronic Mail to:

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