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

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

**CASE NO. 16458** 

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

**CASE NO. 16459** 

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

**CASE NO. 16460** 

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

**CASE NO. 16461** 

## COG'S CONSOLIDATED PRE-HEARING STATEMENT

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

#### **APPEARANCES**

#### **APPLICANT**

## **ATTORNEY**

COG Operating LLC One Concho Center 600 W. Illinois Avenue Midland, Texas 79701 Michael H. Feldewert, Esq. Jordan L. Kessler, Esq. Adam G. Rankin, 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. 16458, COG seeks an order pooling all uncommitted interests in the Bone Spring formation in the 320-acre horizontal spacing unit comprised of the E/2E/2 of Section 15

and the E/2E/2 of Section 22, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico. This horizontal spacing until will be dedicated to the proposed **Huckleberry State Com No. 501H Well,** which will be horizontally drilled from a surface location in the NE/4NE/4 (Unit A) of Section 27 to bottom hole location in the NE/4NE/4 (Unit A) of Section 15.

In Case No. 16459, COG seeks an order pooling all uncommitted interests in the Bone Spring formation in the 320-acre horizontal spacing unit comprised of the W/2E/2 of Section 15 and the W/2E/2 of Section 22, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico. This horizontal spacing until will be dedicated to the two initial wells: the proposed **Huckleberry State Com No. 502H Well** and the proposed **Huckleberry State Com No. 503H Well**. Both wells will be horizontally drilled from a surface location in the NW/4NE/4 (Unit B) of Section 27 to bottom hole location in the NW/4NE/4 (Unit B) of Section 15.

In Case No. 16460, COG seeks an order pooling all uncommitted interests in the Bone Spring formation in the 320-acre horizontal spacing unit comprised of the E/2W/2 of Section 15 and the E/2W/2 of Section 22, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico. This horizontal spacing until will be dedicated to the two initial wells: the proposed **Huckleberry State Com No. 504H Well** and the proposed **Huckleberry State Com No. 505H Well**. Both wells will be horizontally drilled from a surface location in the NE/4NW/4 (Unit C) of Section 27 to bottom hole location in the NE/4NW/4 (Unit C) of Section 15.

In Case No. 16461, COG seeks an order pooling all uncommitted interests in the Bone Spring formation in the 320-acre horizontal spacing unit comprised of the 320-acre horizontal spacing unit comprised of the W/2W/2 of Section 15 and the W/2W/2 of Section 22, Township 21 South, Range 33 East, NMPM, Lea County, New Mexico. This horizontal spacing until will be dedicated to the two initial wells: the proposed **Huckleberry State Com No. 506H Well** and the

proposed **Huckleberry State Com No. 507H Well.** Both wells will be horizontally drilled from a surface location in the NW/4NW/4 (Unit D) of Section 27 to bottom hole location in the NW/4NW/4 (Unit D) of Section 15.

The completed interval for all wells will remain within the standard setback as required by the Statewide rules for oil wells.

### APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Grant Bohls, Landman	Approx. 20	Approx. 10
John Betalott, Geologist	Approx. 5	Approx. 3

#### PROCEDURAL MATTERS

COG respectfully requests that Case Nos. 16458-16461 be consolidated for hearing.

Respectfully submitted,

**HOLLAND & HART LLP** 

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