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

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

**CASE NO. 20700** 

# 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**

# **ATTORNEY**

COG Operating LLC One Concho Center 600 West Illinois Avenue Midland, Texas 79701 Ocean Munds-Dry
William F. Carr
Elizabeth A. Ryan
Michael Rodriguez
Concho Resources LLC
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
omundsdry@concho.com
wcarr@concho.com
eryan@concho.com
mrodriguez@concho.com

#### **OPPOSING**

## **ATTORNEY**

EOG Resources, Inc. 5509 Champions Drive Midland, Texas 79706 Earl E. DeBrine, Jr.
Deanna M. Bennett
Lance D. Hough
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
edebrine@modrall.com
dmb@modrall.com
ldh@modrall.com

# **STATEMENT OF THE CASE**

Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells: (1) The Mastiff Fed Com #706H, the Mastiff Fed Com #707H, and the Mastiff Fed Com #708H wells to be drilled from surface hole locations in SE/4SW/4 (Unit N) of Section 4 to bottom hole locations in the NE/4NW/4 (Unit C) of Section 33; and (2) the Mastiff Fed Com #709H and the Mastiff Fed Com #710H wells to be drilled from surface hole locations in SW/4SW/4 (Unit M) of Section 4 to bottom hole locations in the NW/4NW/4 (Unit D) of Section 33. The completed interval for the proposed Mastiff Fed Com #708H well will be within 330' of the quarter-quarter line separating the W/2W/2 and the E/2W/2 of Sections 4 and 33 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

# **PROPOSED EVIDENCE**

<u>WITNESS</u>	ESTIMATED TIME	<b>EXHIBITS</b>
Adam Reker, Landman	Approx. 20 minutes	Approx. 6
John Bertalott, Geologist	Approx. 20 minutes	Approx. 13
Michael Burkard, Engineer	Approx. 10 minutes	Approx. 1

#### PROCEDURAL MATTERS

COG Operating LLC requests that case numbers 20694, 20700, 20704 and 20706 be consolidated at the October 31, 2019 hearing.

Respectfully submitted,

**COG OPERATING LLC** 

Ocean Munds-Dry
William F. Carr
Elizabeth A. Ryan
Michael Rodriguez
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
(505) 428-0485 Facsimile
omundsdry@concho.com
wcarr@concho.com
eryan@concho.com

#### ATTORNEYS FOR COG OPERATING LLC

mrodriguez@concho.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2019, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Earl E. DeBrine, Jr. – edebrine@modrall.com
Deanna M. Bennett – dmb@modrall.com
Lance D. Hough – ldh@modrall.com

Ocean Munds-Dry William F. Carr Elizabeth A. Ryan Michael Rodriguez