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. 20706

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 #204H, the Mastiff Fed Com #306H, and the Mastiff Fed Com #307H wells to be drilled rom the 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 #205H, the Mastiff Fed Com #308H, the Mastiff Fed Com #309H, the Mastiff Fed Com #310H, the Mastiff Fed Com #506H, the Mastiff Fed Com #507H well to be drilled from surface hole locations in SW/4SW/4 (Unit M) of Section 4 to bottom hole locations in the NW/4N/W 4 (Unit D) of Section 33. The completed interval for the proposed Mastiff Fed Com #308H 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	EXHIBITS
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
mrodriguez@concho.com

ATTORNEYS FOR COG OPERATING LLC

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