

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

**APPLICATION OF B.C. OPERATING, INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

Case No. 20837

**APPLICATION OF B.C. OPERATING, INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

Case No. 20838

**APPLICATION OF B.C. OPERATING, INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

Case No. 20839

PRE-HEARING STATEMENT

B.C. OPERATING, INC. (“BCO” or “Applicant”) provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

B.C. OPERATING, INC.

APPLICANT’S ATTORNEY:

Sharon T. Shaheen, Esq.
John F. McIntyre, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
Telephone: (505) 986-2678
Email: sshaheen@montand.com
jmcintyre@montand.com

OTHER PARTY

COG OPERATING, LLC

OTHER PARTY'S ATTORNEYS:

Ocean Munds-Dry
William F. Carr
Elizabeth A. Ryan
Michael Rodriguez
COG OPERATING LLC
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
Telephone: (505) 780-8000
omundsdry@concho.com
wcarr@concho.com
eryan@concho.com
mrodriguez@concho.com

STATEMENT OF THE CASE

In Case No. **20837**, Applicant seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S243310P [98135]) in a 160-acre spacing unit comprised of the E/2 W/2of Section 13, Township 24 South, Range 33 East, Lea County, New Mexico. Said horizontal spacing unit is to be dedicated to the proposed **Broadside 13 W Fed Com 1H** well, to be horizontally drilled from an approximate surface hole location 350' FSL and 2330' FWL of Section 12-T24S-R33E, to an approximate bottom hole location 20' FSL and 2310' FWL of Section 13-T24S-R33E. The Broadside 13 W Fed Com 1H well will be the defining well for this unit. The completed intervals and first and last take points for this well will meet statewide setback requirements for horizontal wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and lands are located approximately 22 miles northwest of Jal, New Mexico.

In Case No. **20838**, Applicant seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S243310P [98135]) in a 160-acre spacing unit comprised of the W/2 E/2 of Section 13, Township 24 South, Range 33 East, Lea County, New Mexico. Said horizontal spacing unit is to be dedicated to the proposed Broadside 13 W Fed Com 2H well, to be horizontally drilled from an approximate surface hole location 350' FSL and 1803' FEL of Section 12-T24S-R33E, to an approximate bottom hole location 20' FSL and 1651' FEL of Section 13-T24S-R33E. The Broadside 13 W Fed Com 2H well will be the defining well for this unit. The completed intervals and first and last take points for this well will meet statewide setback requirements for horizontal wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and lands are located approximately 22 miles northwest of Jal, New Mexico.

In Case No. **20839**, Applicant seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S243310P [98135]) in a 160-acre spacing unit comprised of the E/2 E/2 of Section 13, Township 24 South, Range 33 East, Lea County, New Mexico. Said horizontal spacing unit is to be dedicated to the proposed Broadside 13 W Fed Com 3H well, to be horizontally drilled from an approximate surface hole location 374' FSL and 313' FEL of Section 12-T24S-R33E, to an approximate bottom hole location 20' FSL and 330' FEL of Section 13-T24S-R33E. The Broadside 13 W Fed Com 3H well will be the defining well for this unit. The completed intervals and first and last take points for this well will meet statewide setback requirements for horizontal wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of

Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The wells and lands are located approximately 22 miles northwest of Jal, New Mexico.

At the time of filing this Prehearing Statement, this application is unopposed.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Phil Hammond (Landman)	15-20 minutes	5-7
Michael Moylett (Geologist)	15-20 minutes	2-3

PROCEDURAL MATTERS

The above-captioned cases should be consolidated at hearing. If the application is unopposed then Applicant will present these cases by affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen

Sharon T. Shaheen
John F. McIntyre
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
Telephone: (505) 982-2678
Email: sshaheen@montand.com
jmcintyre@montand.com

Attorneys for B.C. Operating, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2019, a true and correct copy of the foregoing *Pre-Hearing Statement* was served by electronic mail on the following counsel of record:

Ocean Munds-Dry
William F. Carr
Elizabeth A. Ryan
Michael Rodriguez
COG OPERATING, LLC
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
Telephone: (505) 780-8000
omundsdry@concho.com
wcarr@concho.com
eryan@concho.com
mrodriguez@concho.com

Attorneys for COG Operating, LLC

/s/Sharon T. Shaheen

Sharon T. Shaheen