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 NOS. 20854 & 20855

COG'S CONSOLIDATED PRE-HEARING STATEMENT

COG Operating LLC ("COG"), applicant in the above-referenced cases, 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 Adam G. Rankin Julia Broggi Kaitlyn A. Luck 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. 20854, COG seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation underlying a standard 640-acre, more or less, horizontal spacing unit comprised of Lots 1-2, S/2 NE/4, and the SE/4 (E/2 equivalent) of irregular Section 1, and the E/2 of Section 12, Township 20 South, Range 33 East, Lea County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the following proposed initial wells: the War Eagle Fed Com #504H well (API No. 30-025-pending), and the War Eagle Fed Com #601H well (API No. 30-025-pending), both of which will be drilled from a common surface hole location in SE/4 SE/4 (Unit P) of Section 12 to bottom hole locations in the NE/4 NE/4 (Lot 1) of Section 1. The

completed interval for the proposed **War Eagle Fed Com** #504H well will be within 330' of the quarter-quarter line separating the W/2 E/2 and the E/2 E/2 of Sections 1 and 12 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

In Case No. 20855, COG seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation underlying a standard 640-acre, more or less, horizontal spacing unit comprised of Lots 1-2, S/2 NE/4, and the SE/4 (E/2 equivalent) of irregular Section 1, and the E/2 of Section 12, Township 20 South, Range 33 East, Lea County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the proposed War Eagle Fed Com #701H well (API No. 30-025-pending), to be drilled from a surface hole location in SE/4 SE/4 (Unit P) of Section 12 to a bottom hole location in the NE/4 NE/4 (Lot 1) of Section 1. The completed interval for the proposed War Eagle Fed Com #701H well will be within 330' of the quarter-quarter line separating the W/2 E/2 and the E/2 E/2 of Sections 1 and 12 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Grant Bohls, Landman	Affidavit	Approx. 5
Allison Holcomb, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

COG respectfully requests that these cases be consolidated for purposes of hearing and COG intends to present these cases by affidavit if uncontested at time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC