

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

**APPLICATION OF EOG RESOURCES, INC.  
FOR A GAS CAPTURE PILOT PROJECT  
INVOLVING THE OCCASSIONAL  
INJECTION OF PRODUCED GAS INTO THE  
BONE SPRING FORMATION, LEA COUNTY,  
NEW MEXICO.**

**CASE NO. 20965**

**EOG RESOURCES, INC.'S PRE-HEARING STATEMENT**

EOG Resources, Inc. ("EOG") (OGRID No. 7377), the applicant in the above-captioned case, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

EOG Resources, Inc.

**ATTORNEY**

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  
mfeldewert@hollandhart.com  
agrankin@hollandhart.com  
[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)  
[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

**APPLICANT'S STATEMENT OF CASE**

EOG seeks authorization to engage in a gas capture pilot project in the Leonard Shale interval of the Bone Spring formation ("pilot project"). EOG is the operator of the **Caballo 23 Fed No. 2H Well** (API No. 30-025-40051), a horizontal well located in the E/2 W/2 (Unit C) of

Section 23, Township 25 South, Range 33 East, NMPM, in Lea County, New Mexico. This well is currently producing from the Bone Spring formation (Red Hills; Upper Bone Spring Shale Pool [Pool Code 97900]) and dedicated to a standard horizontal well spacing unit comprised of the E/2 W/2 of Section 23. EOG seeks to authority to utilize this producing well to occasionally inject produced gas into the Leonard Shale interval of the Bone Spring formation at a total vertical depth of approximately 9,418 feet to 9,457 feet along the horizontal portion of the wellbore at surface injection pressures of no more than 3,500 psi. The source of the produced gas will be the Bone Spring, Wolfcamp and Atoka formations delivered to the Localized Gas Lift Compressor Station. EOG seeks authority for this pilot project to avoid the shut-in of producing wells or the temporary flaring of gas during pipeline capacity constraints, mechanical difficulties, plant shut downs, or other events impacting the ability to deliver gas into a pipeline.

#### **APPLICANT'S PROPOSED EVIDENCE**


<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Davis Lunsford, Facilities Engineer	Approx. 20	Approx. 4
Charles Bassett, Landman	Approx. 10	Approx. 3
Brice Letcher, Production Engineer	Approx. 20	Approx. 7
Jenna Hessert, Geologist	Approx. 20	Approx. 3
Carlos Sonka, Reservoir Engineer	Approx. 20	Approx. 4

#### **PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

HOLLAND & HART LLP

By:   
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

agrarkin@hollandhart.com

jbroggi@hollandhart.com

kaluck@hollandhart.com

**ATTORNEYS FOR EOG RESOURCES, INC.**

13909871\_v1