

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

**APPLICATION OF COLGATE OPERATING, LLC
FOR COMPULSORY POOLING, AND NON-
STANDARD SPACING AND PRORATION UNIT IN
EDDY COUNTY, NEW MEXICO**

CASE NO. 21226

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by COLGATE OPERATING, LLC, by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:

Colgate Operating, LLC

ATTORNEY:

Ernest L. Padilla
Padilla Law Firm, P.A.
P.O. Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577
padillalaw@qwestoffice.net

OPPOSITION OR OTHER PARTY:

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order proposing order pooling all mineral interests within the Winchester Bone Spring Pool (Pool Code 65010), underlying Sections 34 and 33, Township 19 South, Range 28 East, NMPM, Eddy County, New Mexico. Applicant seeks to dedicate the above referenced horizontal spacing unit to the following four initial wells:

A. **Dawson 34 Fed State Com 123H**

SHL: 1505 feet from the South line and 715 feet from the East line,
(Unit I) of Section 34, Township 19 South, Range 28 East, NMPM.
BHL: 1650 feet from the South line and 10 feet from the West line,
(Unit L) of Section 33, Township 19 South, Range 28 East, NMPM.
Completion Target: 2nd Bone Spring Sand at approx 7500 feet TVD.
Well Orientation: East to West
Completion Location: standard
Spacing Unit: N/2 S/2 of Section 34 and N/2 S/2 of Section 33

B. **Dawson 34 Fed State Com 133H**

SHL: 1505 feet from the South line and 760 feet from the East line,
(Unit I) of Section 34, Township 19 South, Range 28 East, NMPM.
BHL: 1750 feet from the South line and 10 feet from the West line,
(Unit L) of Section 34, Township 19 South, Range 28 East, NMPM.
Completion Target: 3rd Bone Spring Sand at approx 8600 feet TVD.
Well Orientation: East to West
Completion Location: standard
Spacing Unit: N/2 S/2 of Section 34 and N/2 S/2 of Section 33

C. **Dawson 34 Fed State Com 124H**

SHL: 295 feet from the South line and 560 feet from the East line,
(Unit P) of Section 34, Township 19 South, Range 28 East, NMPM.
BHL: 330 feet from the South line and 10 feet from the West line,
(Unit M) of Section 33, Township 19 South, Range 28 East, NMPM.
Completion Target: 2nd Bone Spring Sand at approx 7500 feet TVD.
Well Orientation: East to West
Completion Location: standard
Spacing Unit: S/2 S/2 of Section 34 and S/2 S/2 of Section 33

D. **Dawson 34 Fed State Com 134H**

SHL: 340 feet from the South line and 560 feet from the East line,
(Unit P) of Section 34, Township 19 South, Range 28 East, NMPM.
BHL: 430 feet from the South line and 10 feet from the West line,
(Unit M) of Section 33, Township 19 South, Range 28 East, NMPM.
Completion Target: 3rd Bone Spring Sand at approx 8600 feet TVD.
Well Orientation: East to West
Completion Location: standard
Spacing Unit: S/2 S/2 of Section 34 and S/2 S/2 of Section 33

OPPOSITION OR OTHER PARTY:

PROPOSED EVIDENCE

APPLICANT

WITNESSES		EST. TIME	EXHIBITS
Name	Title	Topic	Exhibits
Mark Hajdik	Landman	15 min.	Approximately 6
Sergio Ojeda	Geologist	10 min.	Approximately 5

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

None.

PADILLA LAW FIRM, P.A.

/s/ Ernest L. Padilla

Ernest L. Padilla

Attorney for Colgate Operating, LLC

PO Box 2523

Santa Fe, New Mexico 87504

505-988-7577

padillalaw@qwestoffice.net