

**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. 21227**

**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:

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OPPOSITION OR OTHER PARTY:

EOG Resources, Inc.

ATTORNEY:

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**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. **Shamrock 34 Fed State Com 121H**  
SHL: 700 feet from the North line and 330 feet from the West line,  
(Unit D) of Section 35, Township 19 South, Range 28 East, NMPM.  
BHL: 990 feet from the North line and 10 feet from the West line,  
(Unit D) 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 N/2 of Section 34 and N/2 N/2 of Section 33
- B. **Shamrock 34 Fed State Com 131H**  
SHL: 655 feet from the North line and 330 feet from the West line,  
(Unit D) of Section 35, Township 19 South, Range 28 East, NMPM.  
BHL: 890 feet from the North line and 10 feet from the West line,  
(Unit D) 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: N/2 N/2 of Section 34 and N/2 N/2 of Section 33
- C. **Shamrock 34 Fed State Com 122H**  
SHL: 2610 feet from the South line and 295 feet from the East line,  
(Unit I) of Section 34, Township 19 South, Range 28 East, NMPM.  
BHL: 2310 feet from the North line and 10 feet from the West line,  
(Unit E) 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 N/2 of Section 34 and S/2 N/2 of Section 33
- D. **Shamrock 34 Fed State Com 132H**  
SHL: 2610 feet from the South line and 340 feet from the East line,  
(Unit I) of Section 34, Township 19 South, Range 28 East, NMPM.  
BHL: 2210 feet from the North line and 10 feet from the West line,  
(Unit E) 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 N/2 of Section 34 and S/2 N/2 of Section 33

These wells are located approximately 12 miles NE of Carlsbad, New Mexico.

**OPPOSITION OR OTHER PARTY:**

**PROPOSED EVIDENCE**

**APPLICANT**

WITNESSES		EST. TIME	EXHIBITS
Name	Title	Est. time	Exhibits
Mark Hajdik	Landman	15 minutes	Approximately 6
Sergio Ojeda	Geologist	10 minutes	Approximately 5

**OPPOSITION**

WITNESSES

EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

None.

PADILLA LAW FIRM, P.A.

**/s/ Ernest L. Padilla**

Ernest L. Padilla

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**CERTIFICATE OF SERVICE**

I certify that on May 21, 2020, I served a copy of the foregoing pleading by electronic mail to:

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**/s/ Ernest L. Padilla**