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

APPLICATIONS OF COG OPERATING LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 21337 & 21338

# COG'S CONSOLIDATED PRE-HEARING STATEMENT

COG Operating LLC ("COG") (OGRID No. 229137), the applicant in the above-referenced cases, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

## **APPEARANCES**

#### **APPLICANT**

#### **ATTORNEY**

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# **APPLICANT'S STATEMENT OF CASE**

In these consolidated cases, COG seeks orders pooling all uncommitted interests in the Bone Spring formation [Grama Ridge; Bone Spring West Pool (Pool Code 28432)] underlying two standard horizontal spacing units comprised of the E/2 and the E/2 W/2 of Sections 1 and 12, Township 22 South, Range 33 East, NMPM, Lea County, New Mexico.

Under <u>Case 21337</u>, COG seeks to form and initially dedicate the E/2 of Sections 1 and 12 to the following proposed wells:

- Tenderloin Federal Com 501H to be drilled from a surface hole location in NE/4
  NE/4 (Unit A) of Section 13 to a bottom hole location in the NE/4 NE/4 (Lot 1) of
  Section 1; and
- Tenderloin Federal Com 502H to be drilled from a surface hole location in NE/4
  NE/4 (Unit A) of Section 13 to a bottom hole location in the NW/4 NE/4 (Lot 2) of
  Section 1.

The completed interval of the Tenderloin Federal Com 502H well will be within 330 feet of the E/2 E/2 of Sections 1 and 12 to allow inclusion of this offsetting acreage in a standard horizonal well spacing unit.

Under <u>Case 21338</u>, COG seeks to form and initially dedicate the E/2 W/2 of Sections 1 and 12 to the **Tenderloin Federal Com 503H** well. This well will be drilled from a surface hole location in NE/4 NW/4 (Unit C) of Section 13 to a bottom hole location in the NE/4 NW/4 (Lot 3) of Section 1.

## APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Adam Reker, Landman	Affidavit	Approx. 8
Candice Pettijohn, Geologist	Affidavit	Approx. 4

# **PROCEDURAL MATTERS**

COG does not expect opposition at the hearing and therefore intends to consolidate these cases for presentation by affidavit.

Respectfully submitted,

**HOLLAND & HART LLP** 

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# **CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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