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

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

CASE NOS. 21322-21323

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

COG Operating LLC One Concho Center 600 W. Illinois Avenue Midland, Texas 79701 Michael H. Feldewert, Esq. Adam G. Rankin, Esq. Julia Broggi, Esq. Kaitlyn A. Luck, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421

OTHER INTERESTED PARTIES 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 [Winchester; Bone Spring West Pool (97569)] underlying two standard 320-acre standard horizontal spacing units in the S/2 of Sections 20 and 21, Township 19 South, Range 28 East, NMPM, Eddy County, New Mexico.

Under <u>Case 21322</u>, COG seeks to form and initially dedicate the S/2 S/2 of Sections 20 and 21 to the proposed **Bigfoot State Com 501H** and the **Bigfoot State Com 601H** wells to be drilled from a common surface hole location in SE/4 SE/4 (Unit P) of Section 19 to a bottom hole locations in the SE/4 SE/4 (Unit P) of Section 21.

Under <u>Case 21323</u>, COG seeks to form and initially dedicate the N/2 S/2 of Sections 20 and 21 to the proposed **Bigfoot State Com 502H** to be drilled from a surface hole location in SE/4 SE/4 (Unit P) of Section 19 to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 21 and the **Bigfoot State Com 602H** to be drilled from a surface hole location in NE/4 SE/4 (Unit I) of Section 19 to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 21.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Jeff Stout, Landman	Affidavit	Approx. 5
Travis Sparks, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

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

Respectfully submitted,

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ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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