

**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. 21239**

**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**

|                                   |  |
|-----------------------------------|--|
| <b>APPLICANT:</b>                 | Colgate Operating, LLC   |
| <b>ATTORNEY:</b>                  | Ernest L. Padilla<br>Padilla Law Firm, P.A.<br>PO Box 2523<br>Santa Fe, New Mexico 87504<br>(505) 988-7577<br><a href="mailto:padillalaw@qwestoffice.net">padillalaw@qwestoffice.net</a>   |
| <b>OPPOSITION OR OTHER PARTY:</b> | EOG Resources, Inc.  |
| <b>ATTORNEY:</b>                  | Darin C. Savage<br>Andrew D. Schill<br>William E. Zimsky<br>Abadie & Schill, PC<br>214 McKenzie Street<br>Santa Fe, NM 87501<br>(970) 385-4401<br><a href="mailto:darin@abadieschill.com">darin@abadieschill.com</a><br><a href="mailto:andrew@abadieschill.com">andrew@abadieschill.com</a><br><a href="mailto:bill@abadieschill.com">bill@abadieschill.com</a> |

**STATEMENT OF CASE**

**APPLICANT:**

Applicant seeks an order proposing order pooling all mineral interests within the Bone Spring Formation, underlying the N/2 of Section 27 and 28, Township 19 South, Range 28

East, NMPM and Section 28, 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. **Weaver 27 State Com 121H**  
SHL: 655 FNL and 270 FEL of Section 27-19S-28E  
BHL: 990 FNL and 10 FWL of Section 28-19S-28E  
TVD: 7,500  
TMD: 17,179 Targeted Interval: 2nd Bone Spring  
Spacing Unit: N/2 N/2 of Section 27 and N/2 N/2 of Section 28.
- B. **Weaver 27 State Com 122H**  
SHL: 1,975 FNL and 270 FEL of Section 27-19S-28E  
BHL: 2,310 FNL and 10 FWL of Section 28-19S-28E  
TVD: 7,500  
TMD: 17,209  
Targeted Interval: 2nd Bone Spring  
Spacing Unit: S/2 N/2 of Section 27 and S/2 N/2 of Section 28.
- C. **Weaver 27 State Com 131H**  
SHL: 700 FNL and 270 FEL of Section 27-19S-28E  
BHL: 890 FNL and 10 FWL of Section 28-19S-28E  
TVD: 8,600  
TMD: 18,324  
Targeted Interval: 3rd Bone Spring  
Spacing Unit: N/2 N/2 of Section 27 and N/2 N/2 of Section 28.
- D. **Weaver 27 State Com 132H**  
SHL: 2,020 FNL and 270 FEL of Section 27-19S-28E  
BHL: 2,210 FNL and 10' FWL of Section 28-19S-28E  
TVD: 8,600  
TMD: 18,364  
Targeted Interval: 3rd Bone Spring  
Spacing Unit: S/2 N/2 of Section 27 and S/2 N/2 of Section 28.

**OPPOSITION OR OTHER PARTY:**

**PROPOSED EVIDENCE**

**APPLICANT**

| WITNESSES    |           | EST. TIME  | EXHIBITS         |
|--------------|-----------|------------|------------------|
| Name         | Title     | Est. time  | Exhibits         |
| Mark Hajdik  | Landman   | 15 minutes | Approximately 17 |
| Sergio Ojeda | Geologist | 10 minutes | Approximately 11 |

**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 hereby certify that the foregoing pleading was electronically mailed to the following:

Darin C. Savage

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on this 7<sup>th</sup> day of August, 2020.

**/s/ Ernest L. Padilla**

Ernest L. Padilla