

**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

AMENDED PRE-HEARING STATEMENT

This AMENDED 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. PO Box 2523 Santa Fe, New Mexico 87504 (505) 988-7577 padillalaw@qwestoffice.net
OPPOSITION OR OTHER PARTY:	EOG Resources, Inc.
ATTORNEY:	Darin C. Savage Andrew D. Schill William E. Zimsky Abadie & Schill, PC 214 McKenzie Street Santa Fe, NM 87501 (970) 385-4401 darin@abadieschill.com andrew@abadieschill.com bill@abadieschill.com Apache Corporation Candace Callahan Beatty & Wozniak, P.C. 500 Don Gaspar Avenue

Santa Fe, NM 87505
(505) 983-8545
ccallahan@bwenergylaw.com

Magnum Hunter Production, Inc.

Sharon T. Shaheen
John F. McIntyre
Montgomery & Andrews, P.A.
PO Box 2307
(505) 986-2678
sshaheen@montand.com
jmcintyre@montand.com

XTO Energy, Inc.

Andrew J. Cloutier
Hinkle Shanor LLP
PO Box 10
Roswell, NM 88202-0010
acloutier@hinklelawfirm.com

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
 Attorney for Colgate Operating, LLC
 PO Box 2523
 Santa Fe, New Mexico 87504
 505-988-7577
padillalaw@qwestoffice.net

CERTIFICATE OF SERVICE

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

Darin C. Savage	darin@abadieschill.com
Andrew D. Schill	andrew@abadieschill.com
William E. Zimsky	bill@abadieschill.com
Candace Callahan	ccallahan@bwenergylaw.com
Sharon T. Shaheen	sshaheen@montand.com
John F. McIntyre	jmcintyre@montand.com
Andrew J. Cloutier	acloutier@hinklelawfirm.com

on this 10th day of August, 2020.

/s/ Ernest L. Padilla
Ernest L. Padilla