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

APPLICATION OF EOG RESOURCES, INC. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 21411, 21412, 21414, 21445

EOG RESOURCES, INC.'S CONSOLIDATED PRE-HEARING STATEMENT

EOG Resources, Inc. ("EOG") submits this Pre-Hearing Statement pursuant to the rules

of the Oil Conservation Division.

APPEARANCES

APPLICANT

EOG Resources, Inc.

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In **Case No. 21411**, EOG seeks an order from the Division pooling all uncommitted interests in the Bone Spring formation (RED HILLS; BONE SPRING, EAST [97369]) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the SW/4 of Section 27, and the W/2 of Section 34, Township 24 South, Range 34 East, and the NW/4 of Section 3,

Township 25 South, Range 34 East, Lea County, New Mexico. EOG seeks to dedicate the abovereferenced horizontal spacing unit to the following proposed wells:

- The Peregrine 27 Fed Com #301H well and the Peregrine 27 Fed Com #302H well, to be drilled from a common surface hole location in NW/4 SW/4 (Unit L) of said Section 27 to bottom hole locations in the SW/4 NW/4 (Unit E) of said Section 3; and
- The Peregrine 27 Fed Com #303H well to be drilled from a surface hole location in NE/4 SW/4 (Unit K) of said Section 27 to a bottom hole location in the SE/4 NW/4 (Unit F) of said Section 3.

The completed interval for the proposed **Peregrine 27 Fed Com #302H well** will remain within 330 feet of the section line separating: (1) the W/2 SW/4 from the E/2 SW/4 of said Section 27, (2) the W/2 W/2 from the E/2 W/2 of said Section 34, and (3) the W/2 NW/4 from the E/2 NW/4 of said Section 3, to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

In **Case No. 21412**, EOG seeks an order from the Division pooling all uncommitted interests in the Bone Spring formation (RED HILLS; BONE SPRING, EAST [97369]) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the SE/4 of Section 27, and the E/2 of Section 34, Township 24 South, Range 34 East, and the NE/4 of Section 3, Township 25 South, Range 34 East, Lea County, New Mexico. EOG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

• The **Peregrine 27 Fed Com #304H well** to be drilled from a surface hole location in NE/4 SW/4 (Unit K) of said Section 27 to a bottom hole location in the SW/4 NE/4 (Unit G) of said Section 3; and

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- The **Peregrine 27 Fed Com #305H well** to be drilled from a surface hole location in NE/4 SE/4 (Unit I) of said Section 27 to a bottom hole location in the SW/4 NE/4 (Unit G) of said Section 3; and
- The Peregrine 27 Fed Com #306H well to be drilled from a surface hole location in NE/4 SE/4 (Unit I) of said Section 27 to a bottom hole location in the SE/4 NE/4 (Unit H) of said Section 3.

The completed interval for the proposed **Peregrine 27 Fed Com #305H well** will remain within 330 feet of the section line separating: (1) the W/2 SE/4 from the E/2 SE/4 of Section 27, (2) the E/2 E/2 from the W/2 E/2 of Section 34, and (3) the W/2 NE/4 from the E/2 NE/4 of Section 3, to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

In **Case No. 21414**, EOG seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (ANTELOPE RIDGE; WOLFCAMP [2220]) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the SE/4 of Section 27, and the E/2 of Section 34, Township 24 South, Range 34 East, and the NE/4 of Section 3, Township 25 South, Range 34 East, Lea County, New Mexico. EOG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The Peregrine 27 Fed Com #704H well, and the Peregrine 27 Fed Com #744H well, to be drilled from a common surface hole location in NW/4 SE/4 (Unit J) of said Section 27 to bottom hole locations in the SW/4 NE/4 (Unit G) of said Section 3;
- The Peregrine 27 Fed Com #705H well, the Peregrine 27 Fed Com #706H well, the Peregrine 27 Fed Com #735H well, and the Peregrine 27 Fed Com #746H

well to be drilled from a common surface hole location in NE/4 SE/4 (Unit I) of said Section 27 to bottom hole locations in the SE/4 NE/4 (Unit H) of said Section 3; and

 The Peregrine 27 Fed Com #734H well to be drilled from a surface hole location in NE/4 SW/4 (Unit K) of said Section 27 to a bottom hole location in the SW/4 NE/4 (Unit G) of said Section 3.

The completed intervals for the proposed **Peregrine 27 Fed Com #705H well** and the **Peregrine 27 Fed Com #735H well** will remain within 330 feet of the section line separating: (1) the W/2 SE/4 from the E/2 SE/4 of Section 27, (2) the E/2 E/2 from the W/2 E/2 of Section 34, and (3) the W/2 NE/4 from the E/2 NE/4 of Section 3, to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

In **Case No. 21445**, EOG seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (ANTELOPE RIDGE; WOLFCAMP [2220]) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the SW/4 of Section 27, and the W/2 of Section 34, Township 24 South, Range 34 East, and the NW/4 of Section 3, Township 25 South, Range 34 East, Lea County, New Mexico. EOG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

 The Peregrine 27 Fed Com #701H well, the Peregrine 27 Fed Com #702H well, the Peregrine 27 Fed Com #731H well, the Peregrine 27 Fed Com #732H well, the Peregrine 27 Fed Com #741H well, to be drilled from a common surface hole location in NW/4 SW/4 (Unit L) of said Section 27 to bottom hole locations in the SW/4 NW/4 (Unit E) of said Section 3;

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- The Peregrine 27 Fed Com #733H well, and the Peregrine 27 Fed Com #743H well, to be drilled from a common surface hole location in NE/4 SW/4 (Unit K) of said Section 27 to bottom hole locations in the SE/4 NW/4 (Unit F) of said Section 3; and
- The **Peregrine 27 Fed Com #703H well** to be drilled from a surface hole location in NW/4 SW/4 (Unit J) of said Section 27 to a bottom hole location in the SE/4 NW/4 (Unit F) of said Section 3.

The completed intervals for the proposed **Peregrine 27 Fed Com #702H well** and the **Peregrine 27 Fed Com #732H well** will remain within 330 feet of the section line separating: (1) the W/2 SW/4 from the E/2 SW/4 of said Section 27, (2) the W/2 W/2 from the E/2 W/2 of said Section 34, and (3) the W/2 NW/4 from the E/2 NW/4 of said Section 3, to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Laci Stretcher, Landman	Affidavit	Approx. 6
Terra George, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

If uncontested at the hearing, EOG intends to present these cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

Hull

By:

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