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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

> Case No. 14558 Order No. R-7900-C De Novo

APPLICATION OF MARBOB ENERGY CORPORATION (NOW COG OPERATING LLC) FOR VERTICAL EXPANSION OF THE BURCH-KEELY UNIT, EDDY COUNTY, NEW MEXICO

RECEIVED OCD

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

> Case No. 14,577 Order No. R-10,067-B De Novo

APPLICATION OF COG OPERATING, LLC FOR VERTICAL EXPANSION OF THE GRAYBURG-JACKSON (SEVEN RIVERS-QUEEN-GRAYBURG-SAN ANDRES) POOL TO CORRESPOND WITH THE UNITIZED FORMATION OF THE BURCH KEELY UNIT, EDDY COUNTY, NEW MEXICO

MOTION TO CONSOLIDATE CASES FOR HEARING

COG Operating LLC (COG) brings this Motion to Consolidate Case Nos. 14558 and 14577 for the purposes of the De Novo Hearing before the Oil Conservation Commission. In support of this Motion COG states as follows:

- 1. Combining the matters for hearing will save the parties and OCC time and expenses;
- 2. Both cases address the proposal to extend the vertical limits of a unit in one case and a pool in the other case and in both cases the proposed expansion is the same;
- 3. Combining the cases will avoid repetitive hearings on the same facts regarding ownership, geology and economic concerns; and
- 4. Counsel for ConocoPhillips Company has indicated he will not oppose this Motion.

Respectfully submitted this 21st day of June, 2011.

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ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of June, 2011, I sent notice of this filing to counsel of record in this proceeding.

Carøl Leach