



**MONTGOMERY
& ANDREWS**
LAW FIRM

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June 20, 2013

Ms. Jami Bailey, Director
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87501

Hand-Delivered

Re: NMOCD Case No. 14997: Application of COG Operating LLC for Designation of a Non-Standard Oil Spacing and Proration Unit and for Compulsory Pooling, Lea County, New Mexico

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JUN 20 P 2:42

Dear Ms. Bailey:

On behalf of COG Operating LLC, enclosed for filing is an original and one copy of COG's Pre-Hearing Statement in the above-captioned case.

Very truly yours,

Karen Williams
Assistant to J. Scott Hall

JSH:kw

cc: Mike Wallace
Ocean Munds-Dry

478997

REPLY TO:

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

IN THE MATTER OF THE APPLICATION
OF COG OPERATING LLC FOR
DESIGNATION OF A NON-STANDARD OIL
SPACING AND PRORATION UNIT AND
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO

CASE NO. 14997

PRE-HEARING STATEMENT

COG Operating LLC ("COG") provides this Pre-Hearing Statement as required
by the rules of the Division.

APPEARANCES

APPLICANT

COG Operating LLC

APPLICANT'S ATTORNEYS

J. Scott Hall
Seth C. McMillan
Montgomery & Andrews
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873

OTHER PARTY

EOG Resources, Inc.
P.O. Box 4362
Houston, TX 77210-4362

OTHER PARTY'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, NM 87504
(505) 982-2043

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order consolidating the 40-acre spacing units within the W/2
E/2 of Section 8, Township 24 South Range 32 East, NMPM and designating the

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consolidated units as a 160-acre± non-standard oil spacing and proration unit for a well location in the Delaware formation for Applicant's horizontal drilling project area. Applicant further seeks the compulsory pooling of all interests in the Delaware formation underlying the W/2 E/2 of Section 8 to be dedicated to its Bimini "8" Federal Com Well No. 2-H Well to be drilled horizontally from a surface location in the NW/4 NE/4 of Section 8 to a standard bottom hole location in the SW/4 SE/4 of Section 8 to a depth sufficient to test the Delaware formation, Mesaverde-Delaware Pool (96191). Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of COG Operating LLC as operator and a charge for risk involved in drilling the well.

OTHER PARTY

EOG Resources, Inc.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Mike Wallace, Landman.
Henry Zollinger, Geologist

EST. TIME

15
15

EXHIBITS

6
6

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

None.

Montgomery and Andrews, P. A.

By:

J. Scott Hall

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smcmillan@montand.com
Attorneys for COG Operating LLC

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 20th day of June, 2013.

James Bruce, Esq.
P.O. Box 1056
Santa Fe, NM 87504
jamesbruc@aol.com

J. Scott Hall

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