

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

**APPLICATION OF COG OPERATING LLC
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 15812

**APPLICATION OF COG OPERATING LLC
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 15813

COG's PRE-HEARING STATEMENT

COG Operating LLC, the applicant in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

COG Operating LLC
One Concho Center
600 W. Illinois Avenue
Midland, Texas 79701

ATTORNEY

Michael H. Feldewert, Esq.
Jordan L. Kessler, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

RECEIVED OGD
2011 AUG 24 P 1:08

APPLICANT'S STATEMENT OF CASE

In Case No. 15812, COG Operating LLC seeks an order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the E/2 W/2 of Section 16 and the E/2 W/2 of Section 21, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp formation. COG proposes to dedicate the above-

referenced spacing and proration unit as the project area for two proposed initial wells: the proposed **White Falcon 16 Federal Com No. 21H Well** and the proposed **White Falcon 16 Federal Com No. 22H Well**, which will be simultaneously drilled and completed. These wells will be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 16 to a standard bottom hole location in the SE/4 SW/4 (Unit N) of Section 21.

In Case No. 15813, COG seeks an order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the W/2 W/2 of Section 16 and the W/2 W/2 of Section 21, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp formation. COG proposes to dedicate the above-referenced spacing and proration unit as the project area for two proposed initial wells: the proposed **White Falcon 16 State Com No. 23H Well** and the proposed **White Falcon 16 State Com No. 24H Well**, which will be simultaneously drilled and completed. These wells will be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 16 to a standard bottom hole location in the SW/4 SW/4 (Unit M) of Section 21.

The completed interval for all wells will comply with the Division's setback requirements.

APPLICANT'S PROPOSED EVIDENCE

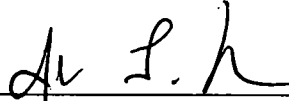
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Mike Wallace – Landman	Approx. 20	Approx. 12
Carrie Martin – Geologist	Approx. 15	Approx. 6
Jayne Junell – Engineer	Approx. 10	Approx. 4

PROCEDURAL MATTERS

COG respectfully requests that Case No. 15812 and 15813 be consolidated for hearing.

Respectfully submitted,

HOLLAND & HART LLP

A handwritten signature in dark ink, appearing to read 'M. H. Feldewert', is positioned above a horizontal line.

Michael H. Feldewert

Jordan L. Kessler

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

jlkessler@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC