

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

**APPLICATION OF ROVER OPERATING,
LLC FOR STATUTORY UNITIZATION,
EDDY COUNTY, NEW MEXICO.**

OCT 25 2018 PM04:18

CASE NO. 16354

**APPLICATION OF ROVER OPERATING,
LLC FOR APPROVAL OF A SECONDARY
RECOVERY PROJECT, EDDY COUNTY,
NEW MEXICO.**

CASE NO. 16355

COG's AMENDED PRE-HEARING STATEMENT

COG Operating LLC ("COG"), the opponent in the above-referenced matters, submits this
Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Rover Operating, LLC

ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87104
(505) 982-2043
jamesbruc@aol.com
Attorney for Rover Operating, LLC

OPPONENT

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

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Jordan L. Kessler, Esq.
Julia Broggi, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
Attorneys for COG Operating LLC

APPLICANT'S STATEMENT OF CASE

Rover Operating, LLC ("Rover") seeks an order statutorily unitizing mineral interest owners for the purpose of instituting a secondary recovery project. Rover seeks to unitize 639.60 acres comprised of Section 2, Township 17 South, Range 31 East, NMPM, Eddy County, New Mexico, from the top of the Loco Hills Sand to the base of the Lovington Sand.

OPPONENT'S STATEMENT OF CASE

COG owns mineral rights in said Section 2 directly below the proposed unitized formation. COG objects to the proposed secondary recovery project due to 1) pressure issues associated with drilling through the injection interval; and 2) the impact of injection on older existing wells in the area. COG will be requesting that the Division impose of certain conditions to address these issues into any order resulting from this hearing.

OPPONENT'S PROPOSED EVIDENCE

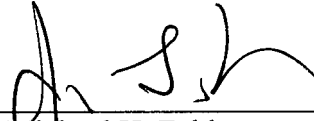
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Stuart Dirks – Landman	Approx. 15	Approx. 4
Harvin Broughton – Geologist	Approx. 15	Approx. 5
Jayne Junell – Reservoir Engineer	Approx. 15	Approx. 5
Ryan Murphy – Production Engineer	Approx. 15	Approx. 5
Parker Simmons – Drilling Engineer	Approx. 15	Approx. 5

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert

Adam G. Rankin

Jordan L. Kessler

Julia Broggi

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

agrarkin@hollandhart.com

jlkessler@hollandhart.com

jbroggi@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce

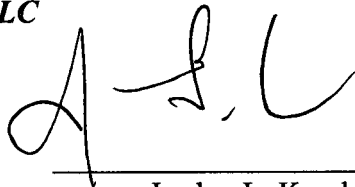
P.O. Box 1056

Santa Fe, New Mexico 87104

(505) 982-2043

jamesbruc@aol.com

Attorney for Rover Operating, LLC



Jordan L. Kessler