

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

**APPLICATION OF COG OPERATING LLC
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 20078

COG'S CONSOLIDATED PRE-HEARING STATEMENT

COG Operating LLC ("COG"), the applicant in the above-referenced matter, submits this consolidated 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.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

APPLICANT'S STATEMENT OF CASE

COG seeks an order pooling all uncommitted interests in the Wolfcamp formation in the 767.59-acre horizontal spacing unit comprised of the E/2 of Section 19, the E/2 of Section 30, and the E/2 equivalent (N/2 NE/4, Lot 4, Lot 5) of Section 31, Township 26 South, Range 28 East, NMPM, Eddy County, New Mexico. COG seeks to dedicate the above-referenced horizontal spacing unit to six initial wells, to be drilled simultaneously from two pads:

- The proposed **Way South State Com No. 701H Well**, the proposed **Way South State Com No. 702H Well**, and the proposed **Way South State Com No. 703H**

Well, to be horizontally drilled from a surface location in the SE/4NE/4 (Lot 5) of Section 31 to a bottom hole location in NE/4NE/4 (Unit A) of Section 19.

- The proposed **Way South State Com No. 704H Well**, to be horizontally drilled from a surface location in the SW/4 NE/4 (Lot 4) of Section 31 to a bottom hole location in NE/4 NE/4 (Unit A) of Section 19.
- The proposed **Way South State Com No. 705H Well**, the proposed **Way South State Com No. 706H Well**, to be horizontally drilled from a surface location in the SW/4 NE/4 (Lot 4) of Section 31 to a bottom hole location in NW/4 NE/4 (Unit B) of Section 19.

The completed interval for all wells will remain within the standard setback as required by the Statewide rules for oil wells.

APPLICANT'S PROPOSED EVIDENCE

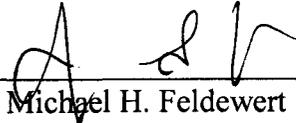
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Ashley Roush, Landman	Approx. 10	Approx. 5
Matt Fisher, Geologist	Approx. 5	Approx. 3

PROCEDURAL MATTERS

If unopposed, this case will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert

Jordan L. Kessler

Adam G. Rankin

Julia Broggi

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

AGRankin@hollandhart.com

jlkessler@hollandhart.com

jbroggi@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC