# 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. 20419** 

#### **COG'S PRE-HEARING STATEMENT**

COG Operating LLC ("COG"), 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**

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#### APPLICANT'S STATEMENT OF CASE

COG seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool) underlying a 768.56-acre, more or less, standard horizontal spacing unit comprised of the W/2 of Sections 19, 30, and 31, Township 26 South, Range 28 East, NMPM, Eddy County, New Mexico. COG seeks to dedicate the above-referenced horizontal spacing unit to three initial wells, to be drilled simultaneously from two pads:

- The Way South State Com No. 706H well to be horizontally drilled from a surface location in the SW/4 NE/4 (Unit G) of Section 31 to a bottom hole location in NE/4 NW/4 (Unit C) of Section 19; and
- The Way South State Com No. 709H and Way South State Com No. 710H wells to be horizontally drilled from a surface location in the SW/4 NW/4 (Unit E) of Section 31 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 19.

The completed interval for these wells will comply with the setback requirements imposed by the Special Rules for the Purple Sage; Wolfcamp (Gas) Pool.

The Way South State Com No. 706H Well was originally proposed in Case No. 20078 (Order No. R-20423), but under COG's revised drilling plan, the Way South State Com No. 706H has been moved to the W/2 spacing unit, as proposed in this case.

#### APPLICANT'S PROPOSED EVIDENCE

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

#### PROCEDURAL MATTERS

Since COG is not aware of any opposition to this pooling application, this matter will be presented by affidavits.

## Respectfully submitted,

# HOLLAND & HART LLP

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## ATTORNEYS FOR COG OPERATING LLC