



**MONTGOMERY
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March 25, 2010

Ms. Florene Davidson
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

HAND DELIVERED

Re: In the Matter of the Hearing Called by the Oil Conservation Division for the Purpose of Considering the Application of COG Operating LLC to Conduct Injection Operations for Evaluation for Secondary Recovery Operations, Eddy County, New Mexico, NMOCD Case No. 14456

Dear Ms. Davidson:

Enclosed for filing in the above-mentioned case is an original Pre-Hearing Statement and one copy.

Thank you.

Very truly yours,

Karen Williams
Assistant to J. Scott Hall

:kw

Enclosures
00174400

REPLY TO:

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

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**IN THE MATTER OF THE APPLICATION OF COG
OPERATING, LLC FOR AUTHORIZATION TO
CONDUCT INJECTION OPERATIONS FOR
EVALUATION FOR SECONDARY RECOVERY
OPERATIONS, EDDY COUNTY, NEW MEXICO**

CASE NO. 14456

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by COG Operating LLC as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

COG Operating LLC
550 W. Texas Ave.
Suite 1300
Midland, TX 79701

APPLICANT'S ATTORNEY

J. Scott Hall
Montgomery & Andrews
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
(505) 986-2646

OPPONENT

Lime Rock Resources

OPPONENT'S ATTORNEY

James Bruce
P. O. Box 1056
Santa Fe, NM 87504

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order authorizing the injection of water into the Paddock and Blinebry members of the Glorieta-Yeso formation, Empire East Yeso Pool (96610) in Eddy County, New Mexico. Applicant is the operator of the following well:

WST 3/25/10

Mesquite State No. 15
API No. 30-015-34496
1750' FSL & 990' FWL (Unit L)
Section 20
T-17-S, R-29-E, NMPM
Eddy County, New Mexico

Mesquite State No. 15 well is drilled to a total depth of 5415' and was originally operated as a producing oil well. COG proposes to convert and utilize the well for injection of water through a closed system into the Paddock and Blinebry formations, Empire East Yeso Pool, through perforations within the depths of 3,873' to 4,214' (Paddock) and 4,336' to 5,289' (Blinebry). Data from injection will be utilized to evaluate the feasibility of secondary recovery operations in the referenced formations.

Injection operations through the well will be conducted at an anticipated average daily injection pressure of 2,000 psi with a maximum surface injection pressure of 2,000 psi or as permitted by the Division, in excess of a 0.2 psi/ft. gradient. Applicant proposes injection of water at average daily rates of approximately 1,000 bbls and at maximum daily rates of approximately 2,000 bbls. The source of the injected fluids will be formation water from production wells that have been drilled and are scheduled to be drilled in the area.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Richard Prentice, Petroleum Engineer	1 hour	(C-108's and supporting materials)
Ramon Reyes, Geologist	15 minutes	3

OPPONENT

EST. TIME EXHIBITS

PROCEDURAL MATTERS

Applicant may request that cases 14,455, 14,456 and 14,457 be consolidated for hearing.

MONTGOMERY & ANDREWS, P.A.

By: _____



J. Scott Hall, Esq.

Post Office Box 2307

Santa Fe, New Mexico 87504

(505) 982-3873

Attorneys for COG Operating, LLC

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was delivered to
counsel of record on the 25th day of March, 2010, via electronic mail.

James Bruce
P. O. Box 1056
Santa Fe, NM 87504

J. Scott Hall
J. Scott Hall

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