



**MONTGOMERY  
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2010 MAR 25 P 3:42

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. 14455**

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

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Enclosures  
00174403

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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. 14455**

**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 Blinbry members of the Glorieta-Yeso formation, Empire Yeso Pool (96210) in Eddy County, New Mexico. Applicant is the operator of the following wells:

Continental A State No. 11  
API No. 30-015-34742  
1450' FNL & 1907' FWL (Unit F)  
Section 30  
T-17-S, R-29-E, NMPM  
Eddy County, New Mexico

Continental A State No. 12  
API No. 30-015-35052  
330' FNL & 583' FWL (Unit D)  
Section 30  
T-17-S, R-29-E, NMPM  
Eddy County, New Mexico

Continental A State No. 11 well is drilled to a total depth of 5757' and the Continental A State No. 12 to a total depth of 5460'. Both wells were originally operated as producing oil wells. COG proposes to convert and utilize the wells for injection of water through a closed system into the Paddock and Blinebry formations, Empire Yeso Pool, through perforations within the depths of 3,926' to 4,277' (Paddock) and 4,436' to 5,088' (Blinebry) (Continental A State Well No. 11). For the Continental A State No. 12, the perforations will be within the depths of 3,811' to 4,044' (Paddock) and 4,400' to 5,297' (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

WITNESSES

EST. TIME

EXHIBITS

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 25<sup>th</sup> day of March, 2010, via electronic mail.

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



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J. Scott Hall

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