

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

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

CASE NO. _____

APPLICATION

Pursuant to NMSA § 70-2-17, **COG Operating LLC** (“Applicant”) (OGRID No. 229137), through its undersigned attorney, hereby files this Application with the Oil Conservation Division of the State of New Mexico (“Division”) for an order (1) creating a 640-acre, more or less, non-standard horizontal well spacing unit comprised of the W/2 of Sections 28 and 33, located in Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico (“Unit”), and (2) pooling all uncommitted interest within the Willow Lake; Bone Spring Formation, designated as an oil pool (Pool Code 64450), underlying said Unit. In support of its Application, Applicant states the following:

1. Applicant is a working interest owner in the Unit and has the right to drill thereon.
2. Applicant seeks to dedicate the above-referenced Unit to the following wells, referred to herein as the Wells:
 - a. **Sharpshooter Fed Com 551H**, that will be horizontally drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 33, Township 24 South, Range 28 East, being approximately 1,353 feet FSL, and approximately 1,428 feet FWL of Section 33, Township 24 South, Range 28 East, to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 28, Township 24 South, Range 28 East, being approximately 50 feet FNL, and approximately 330 feet FWL of Section 28, Township 24 South, Range 28 East;
 - b. **Sharpshooter Fed Com 552H**, that will be horizontally drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 33, Township 24 South, Range 28 East, being approximately 1,353 feet FSL, and approximately 1,468 feet FWL of Section 33, Township 24 South, Range 28 East, to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 28, Township 24 South, Range 28 East, being

approximately 50 feet FNL, and approximately 1,650 feet FWL of Section 28, Township 24 South, Range 28 East;

3. Applicant has undertaken diligent, good-faith efforts to obtain voluntary agreements from all interest owners to participate in the drilling of the Well but has been unable to obtain voluntary agreements from all interest owners.
4. The approval of this Unit and pooling of uncommitted interests within the Unit will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.
5. The approval of this Unit and pooling of uncommitted interests within the Unit will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.
6. In order to allow Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in the Unit should be pooled and Applicant should be designated the operator of the Wells and Unit.

WHEREFORE, Applicant states that this case has been set for contested hearing on April 28, 2026 in Case Nos. 25851 (W/2 W/2) and 25852 (E/2 W/2), and Applicant requests that this Application be consolidated with these matters. After notice and hearing, Applicant requests that the Division enter an order:

- A. Pooling all uncommitted interests in the Unit;
- B. Approving the Wells in the Unit;
- C. Designating Applicant as operator of the Unit and the Wells;
- D. Authorizing Applicant to recover its costs of drilling, equipping and completing the Wells;
- E. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% penalty for the risk assumed by Applicant in drilling and completing the Wells against any working interest owner who does not voluntarily participate in the drilling of the Wells.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2026, I served a copy of the foregoing document to the following counsel of record via electronic mail to:

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