

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

**APPLICATIONS OF COLGATE OPERATING, LLC
FOR COMPULSORY POOLING IN
EDDY COUNTY, NEW MEXICO.**

CASE NOS. 22397-22398

CONSOLIDATED PRE-HEARING STATEMENT

Colgate Operating, LLC (“Applicant”) submits its Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Colgate Operating, LLC

ATTORNEYS

Dana S. Hardy
Michael Rodriguez
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com

INTERESTED PARTIES

Apache Corporation

ATTORNEYS

Dalva L. Moellenberg
Scott Woody
1239 Paseo de Peralta
Santa Fe, NM 87501
Phone: (505) 982-9523
Facsimile: (505) 983-8160
dln@gknet.com
Scott.Woody@gknet.com

EOG Resources, Inc.

Jobediah Rittenhouse
216 16th St., Suite 1100
Denver, CO 80202
(303) 407-4499
jrittenhouse@bwenergylaw.com

MRC Permian Company

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com

STATEMENT OF THE CASE

In **Case No. 22397**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the S/2N/2 of Sections 16 and 17, Township 19 South, Range 28 East, Eddy County, New Mexico (“Unit”). The Unit will be dedicated to the Black Cat 16 State Com 122H and Black Cat 16 State Com 132H wells (“Wells”) to be horizontally drilled from a surface hole location in the NE/4NE/4 (Unit A) of Section 16 to a bottom hole location in the SW/4NW/4 (Unit E) of Section 17. The completed intervals of the Wells will be orthodox.

In **Case No. 22398**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the N/2N/2 of Sections 16 and 17, Township 19 South, Range 28 East, Eddy County, New Mexico (“Unit”). The Unit will be dedicated to the Black Cat 16 State Com 121H and Black Cat 16 State Com 131H wells (“Wells”) to be horizontally drilled from a surface hole location in the NE/4NE/4 (Unit A) of Section 16 to a bottom hole location in the NW/4NW/4 (Unit D) of Section 17. The completed intervals of the Wells will be orthodox.

Also, to be considered will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately 18 miles northeast of Carlsbad.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Mark Hajdik	Landman	Affidavit	Approx. 7
David DaGian	Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Applicant requests Case Nos. 22397 and 22398 be consolidated for hearing. Applicant will present its cases by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy
Dana S. Hardy
Michael Rodriguez
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com
Counsel for Colgate Operating, LLC

Certificate of Service

I hereby certify that on February 10, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Dalva L. Moellenberg
Scott Woody
1239 Paseo de Peralta
Santa Fe, NM 87501
Phone: (505) 982-9523
Facsimile: (505) 983-8160
dln@gknet.com
Scott.Woody@gknet.com
Counsel for Apache Corporation

Jobediah Rittenhouse
216 16th St., Suite 1100
Denver, CO 80202
(303) 407-4499
jrittenhouse@bwenergyllaw.com
Counsel for EOG Resources, Inc.

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com
Counsel for MRC Permian Company

/s/ Dana S. Hardy
Dana S. Hardy

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 80738

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 80738
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>