

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

**APPLICATIONS OF COG OPERATING LLC
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 22460, 22461, 22462

COG’S CONSOLIDATED PRE-HEARING STATEMENT

COG Operating LLC (“COG”) (OGRID No. 229137), the applicant in the above-referenced cases, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

COG Operating LLC

OTHER PARTIES

Cimarex Energy Co.

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Kaitlyn A. Luck, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

ATTORNEY

Earl E. DeBrine, Jr.
Deana M. Bennett
Bryce H. Smith
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800

APPLICANT'S STATEMENT OF CASE

In **Case No. 22460**, COG seeks an order pooling all uncommitted interests in a portion of the Bone Spring formation, from a depth of 10,000 feet to the base of the Bone Spring formation, underlying a standard 639.87-acre, more or less, horizontal spacing unit comprised of Lots 3 & 4, S/2 NW/4, SW/4 (W/2 equivalent) of Section 5, Township 24 South, Range 32 East and the W/2 of Section 32, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico. The spacing unit will be dedicated to the following proposed initial wells: the **Gin and Tectonic Federal Com #504H well**, to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 5 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 32; and the **Gin and Tectonic Federal Com #505H well** and the **Gin and Tectonic Federal Com #506H well**, both of which will be drilled from a surface location in SW/4 SW/4 (Unit M) of Section 5 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 32. The completed interval for the proposed **Gin and Tectonic Federal Com #505H well** will be within 330 feet of the line separating the E/2 W/2 and W/2 W/2 to allow inclusion of this acreage in the spacing unit. A depth severance exists in the Bone Spring formation within the proposed the horizontal spacing unit. As such, COG seeks to pool only a portion of the Bone Spring formation, from a depth of 10,000 feet, to the base of the Bone Spring formation, as defined in the Assignment of Undivided Interest in Oil and Gas, dated March 1, 1996, that covers the SE/4 NW/4 of Section 32, Township 23 South, Range 32 East, and in the Gamma Ray-Neutron Log of the Falcon 32 State #001H Well (API No. 30-025-33001).

In **Case No. 22461**, COG seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 639.13-acre, more or less, horizontal spacing unit comprised of Lots 1 & 2, S/2 NE/4, SE/4 (E/2 equivalent) of Section 5, Township 24 South, Range 32 East, and the E/2 of Section 32, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico.

The spacing unit will be dedicated to the following proposed initial wells: the **Gin and Tectonic Federal Com #701H well**, and the **Gin and Tectonic Federal Com #702H well**, both of which will be drilled from a surface location in SE/4 SE/4 (Unit P) of Section 5 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 32; the **Gin and Tectonic Federal Com #703H well**, to be drilled from a surface hole location in SE/4 SE/4 (Unit P) of Section 5 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 32; and the **Gin and Tectonic Federal Com #704H well**, to be drilled from a surface hole location in SW/4 SE/4 (Unit O) of Section 5 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 32. The completed interval for the proposed **Gin and Tectonic Federal Com #702H well** will be within 330 feet of the line separating the E/2 E/2 and W/2 E/2 to allow inclusion of this acreage in the spacing unit.

In **Case No. 22462**, COG seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 639.87-acre, more or less, horizontal spacing unit comprised of Lots 3 & 4, S/2NW/4, SW/4 (W/2 equivalent) of Section 5, Township 24 South, Range 32 East and the W/2 of Section 32, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico. The spacing unit will be dedicated to the following proposed initial wells: the **Gin and Tectonic Federal Com #705H well**, to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 5 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 32; the **Gin and Tectonic Federal Com #706H well** to be drilled from a surface hole location in SW/4 SW/4 (Unit M) of Section 5 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 32; and the **Gin and Tectonic Federal Com #707H well**, and the **Gin and Tectonic Federal Com #708H well**, to be drilled from a surface hole location in SW/4 SW/4 (Unit M) of Section 5 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 32. The completed interval for the proposed **Gin**

and Tectonic Federal Com #707H well will be within 330 feet of the line separating the E/2 W/2 and W/2 W/2 to allow inclusion of this acreage in the spacing unit.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brian Dart, Landman	Affidavit	Approx. 12
Joseph Dishron, Geology	Affidavit	Approx. 12

PROCEDURAL MATTERS

COG asks that these cases be consolidated for hearing. COG does not anticipate opposition to these pooling applications and therefore intends to present these cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail:

Earl E. DeBrine, Jr.
Deana Bennett
Bryce Smith
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
earl.debrine@modrall.com
deana.bennett@modrall.com
bryce.smith@modrall.com

Attorneys for Cimarex Energy Co.



Adam G. Rankin

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 95035

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 95035
	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>