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

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

CASE NOS. 22796 - 22799

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 ATTORNEYS

Colgate Operating, LLC Dana S. Hardy

Jaclyn McLean Hinkle Shanor LLP P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

INTERESTED PARTIES ATTORNEYS

MRC Permian Company Michael H. Feldewert

Adam G. Rankin Julia Broggi

Holland & Hart LLP

P.O. Box 2208

Santa Fe, NM 87504 Phone: (505) 988-4421

mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com

Sabinal Energy Operating, LLC Blake C. Jones

Steptoe & Johnson PLLC

1780 Hughes Landing Blvd., Suite 750

The Woodlands, TX 77380 Phone: (281) 203-5730

Blake.jones@steptoe-johnson.com

STATEMENT OF THE CASE

In Case No. 22796, Applicant applies for an order pooling all uncommitted interests from the top of the Bone Spring Formation to the base of the Second Bone Spring Formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the N/2 N/2 of Sections 23 and 24, Township 20 South, Range 28 East, Eddy County, New Mexico ("Unit"). The Unit will be dedicated to the **Bondi 24 Fed Com 121H** well ("Well") to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 24 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 23. A depth severance exists in the Bone Spring Formation within the Unit. Accordingly, Applicant seeks to pool uncommitted interests from the top of the Bone Spring Formation at a stratigraphic equivalent of approximately 5,250' MD to the base of the Second Bone Spring Formation at a stratigraphic equivalent of approximately 7,624' MD as observed on the Government AA #1 well log (API 30-015-21286).

In Case No. 22797, Applicant applies for an order pooling all uncommitted interests from the top of the Bone Spring Formation to the base of the Second Bone Spring Formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the S/2 N/2 of Sections 23 and 24, Township 20 South, Range 28 East, Eddy County, New Mexico ("Unit"). The Unit will be dedicated to the Bondi 24 Fed Com 122H well ("Well") to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 24 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 23. A depth severance exists in the Bone Spring Formation within the Unit. Accordingly, Applicant seeks to pool uncommitted interests from the top of the Bone Spring Formation at a stratigraphic equivalent of approximately 5,250' MD to the base of the Second Bone Spring Formation at a stratigraphic equivalent of approximately 7,624' MD as observed on the Government AA #1 well log (API 30-015-21286).

In Case No. 22798, Applicant applies for an order pooling all uncommitted interests from the top of the Bone Spring Formation to the base of the Second Bone Spring Formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the N/2 S/2 of Sections 23 and 24, Township 20 South, Range 28 East, Eddy County, New Mexico ("Unit"). The Unit will be dedicated to the **Bondi 24 Fed Com 123H** well ("Well") to be horizontally drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 24 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 23. A depth severance exists in the Bone Spring Formation within the Unit. Accordingly, Applicant seeks to pool uncommitted interests from the top of the Bone Spring Formation at a stratigraphic equivalent of approximately 5,250' MD to the base of the Second Bone Spring Formation at a stratigraphic equivalent of approximately 7,624' MD as observed on the Government AA #1 well log (API 30-015-21286).

In Case No. 22799, Applicant applies for an order pooling all uncommitted interests from the top of the Bone Spring Formation to the base of the Second Bone Spring Formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the S/2 S/2 of Sections 23 and 24, Township 20 South, Range 28 East, Eddy County, New Mexico ("Unit"). The Unit will be dedicated to the **Bondi 24 Fed Com 124H** well ("Well") to be horizontally drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 24 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 23. A depth severance exists in the Bone Spring Formation within the Unit. Accordingly, Applicant seeks to pool uncommitted interests from the top of the Bone Spring Formation at a stratigraphic equivalent of approximately 5,250' MD to the base of the Second Bone Spring Formation at a stratigraphic equivalent of approximately 7,624' MD as observed on the Government AA #1 well log (API 30-015-21286).

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 11.12 miles northeast of Carlsbad, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Travis Macha	Landman	Affidavit	Approx. 7
David DaGian	Geologist	Affidavit	Approx. 7

PROCEDURAL MATTERS

Applicant requests that these cases be consolidated for hearing. Applicant will present its cases by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy Jaclyn McLean P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

Counsel for Colgate Operating, LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Prehearing Statement was sent to the following counsel by electronic mail on this 26th day of May, 2022.

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
P.O. Box 2208
Santa Fe, NM 87504
Phone: (505) 988-4421
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
Counsel for MRC Permian Co.

Blake C. Jones Steptoe & Johnson PLLC 1780 Hughes Landing Blvd., Suite 750 The Woodlands, TX 77380 Phone: (281) 203-5730 Blake.jones@steptoe-johnson.com Counsel for Sabinal Energy Operating, LLC

/s/ 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

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 111399

QUESTIONS

Operator:	OGRID:
COLGATE OPERATING, LLC	371449
300 North Marienfeld Street	Action Number:
Midland, TX 79701	111399
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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