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

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

CASE NOS. 22881, 22882

CONSOLIDATED PRE-HEARING STATEMENT

COG Operating, LLC ("COG" or "Applicant") submits its Consolidated Pre-Hearing

Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

ATTORNEYS

COG 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

None.

STATEMENT OF THE CASE

In **Case No. 22881**, COG applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of the E/2 of Sections 9 and 16, Township 24 South, Range 32 East, Lea County, New Mexico. The Unit will be dedicated to following wells:

Double ABJ 16 Federal Com 501H well, which will be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 16 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 9; and

 Double ABJ 16 Federal Com 502H well, which will be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 16 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 9.

The completed intervals of the wells will be orthodox. The completed interval of the Double ABJ Federal Com 502H well will be located within 330' of the quarter-quarter section line separating the E/2 E/2 and W/2 E/2 of Sections 9 and 16 to allow for the creation of a 640-acre standard horizontal spacing unit.

In **Case No. 22882**, COG applies for an order pooling all uncommitted interests within the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of the E/2 of Sections 9 and 16, Township 24 South, Range 32 East, Lea County, New Mexico. The Unit will be dedicated to the following wells:

- Double ABJ 16 Federal Com 701H well, which will be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 16 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 9;
- Double ABJ 16 Federal Com 702H well, which will be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 16 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 9; and
- Double ABJ 16 Federal Com 703H well, which will be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 16 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 9.

The completed intervals of the wells will be orthodox. The completed interval of the Double ABJ 16 Federal Com 702H well will be located within 330' of the quarter-quarter section line separating the E/2 E/2 and W/2 E/2 of Sections 9 and 16 to allow for the creation of a 640-acre standard horizontal spacing unit.

Also to be considered in each case 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 29 miles northwest of Jal, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Michael Potts	Landman	Affidavit	Approx. 5
Joseph Dishron	Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Applicant requests Case Nos. 22881 and 22882 be consolidated for hearing. Applicant will present its cases by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

<u>/s/ Dana S. Hardy</u> 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 COG Operating, LLC*

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

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Action 121927

QUESTIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	121927
	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.	