

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

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

CASE NOS. 23052 & 23053

APPLICANT’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

ATTORNEY

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

APPLICANT’S STATEMENT OF CASE

In these consolidated cases, COG seeks orders pooling all uncommitted interests in the Wolfcamp formation [Purple Sage; Wolfcamp Pool (Pool Code 98220)] underlying Sections 24, 25 and 36, Township 25 South, Range 27 East, NMPM, in Eddy County as follows:

- Under Case 23052, COG seeks an order pooling all uncommitted interest owners in the Wolfcamp formation underlying a standard 960-acre horizontal well spacing unit comprised of the E/2 of Sections 24, 25 and

36. This spacing unit will be initially dedicated to the following proposed wells:

- the **Atticus State Com 701H** and the **Atticus State Com 702H** wells to be drilled from a common surface hole location in the SE/4 SE/4 (Unit P) of Section 36 to bottom hole locations, respectively, in the NE/4 NE/4 (Unit A) and the NW/4 NE/4 (Unit B) of Section 24; and
 - the **Atticus State Com 703H** well, to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 36 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 24.
- Under Case 23052, COG seeks an order pooling all uncommitted interest owners in the Wolfcamp formation underlying a standard 960-acre horizontal well spacing unit comprised of the W/2 of Sections 24, 25 and 36. This spacing unit will be initially dedicated to the following proposed wells:

- The **Atticus State Com 704H** well, to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 36 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 24; and
- The **Atticus State Com 705H** and the **Atticus State Com 706H** wells to be drilled from a common surface hole location in the SW/4 SW/4 (Unit M) of Section 36 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 24.

COG has sought but been unable to reach voluntary agreement for the development of this acreage with all the mineral owners.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Shelley C. Klingler, Landman	Affidavit	Approx. 6
Jessica Pontiff, Geology	Affidavit	Approx. 3

PROCEDURAL MATTERS

COG asks that these cases be consolidated for hearing and intends to present these cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
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
pmvance@hollandhart.com

ATTORNEYS 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

Action 147522

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 147522
	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>