# 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 <u>Case 23052</u>, 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 <u>Case 23052</u>, 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

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# **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 147524

QUESTIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	147524
	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.	