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

APPLICATIONS OF COG OPERATING LLC FOR COMPULSORY POOLING AND APPROVAL OF NON-STANDARD SPACING UNITS, LEA COUNTY, NEW MEXICO

CASE NOS. 24059

24060

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

CASE NO. 24061

CONSOLIDATED PRE-HEARING STATEMENT

COG Operating LLC ("COG" or "Applicant") submits its 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 jmclena@hinklelawfirm.com

INTERESTED PARTIES ATTORNEYS

None.

STATEMENT OF THE CASES

In Case No. 24059, COG applies for an order: (1) establishing a 1280-acre, more or less, non-standard horizontal spacing unit comprised of Sections 28 and 33, Township 25 South, Range 35 East, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp formation underlying the Unit. The Unit will be dedicated to the following proposed wells:

Akubra Federal Com 701H well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 28; Akubra Federal Com 702H well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 28; Akubra Federal Com 703H well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 4 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 28; Akubra Federal Com 801H well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 4 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 4 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 28.

In Case No. 24060, COG applies for an order: (1) establishing a 960-acre, more or less, non-standard horizontal spacing unit comprised of the W/2 and W/2 E/2 of Sections 28 and 33, Township 25 South, Range 35 East, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Bone Spring formation underlying the Unit. The Unit will be dedicated to the following proposed wells: Akubra Federal Com 601H, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 4 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 28; and Akubra Federal Com 602H, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 4 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 28.

In Case No. 24061, COG seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Sections 28 and 33, Township 25 South, Range 35 East, Lea County, New Mexico. Applicant seeks to dedicate the Unit to the Akubra Federal Com 603H well, which will

be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 4 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 28.

The completed intervals of the Wells will be orthodox. Also to be considered will be the cost of drilling and completing the Wells and the allocation of the cost, 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 9.5 miles west of Jal, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Blair Brummell	Land Negotiator	Affidavit	Approx. 5
Laura Vargas	Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Applicant intends to consolidate these cases for hearing and will present these matters 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 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

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 302585

QUESTIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	302585
	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.		