

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

**APPLICATION OF COG OPERATING LLC
FOR APPROVAL OF A NON-STANDARD
947-ACRE HORIZONTAL WELL SPACING UNIT
AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. _____

APPLICATION

COG Operating LLC (“COG” or “Applicant”) (OGRID No. 229137), through its undersigned attorneys, files this application with the Oil Conservation Division (“Division”) for an order (a) approving a 947-acre, more or less, non-standard horizontal well spacing unit in the Wolfcamp formation underlying Lots 3-4, E/2 SW/4, and SE/4 (S/2 equivalent) of irregular Section 30 and all of irregular Section 31, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico and (b) pooling all uncommitted interests in this acreage. In support of this application, COG states:

1. Applicant is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon.
2. Due to the nature and configuration of the federal leases in the subject area, the Bureau of Land Management (“BLM”) will not approve the commingling of production at central facilities if the subject area is developed using standard horizontal well spacing units. *See, e.g.*, 43 CFR 3173.14 (addressing authorized commingling). However, if the proposed non-standard spacing unit is approved by the Division, the BLM has stated it will issue a corresponding Communitization Agreement for the federal leases within the subject area to allow commingling and the corresponding reduction of the necessary surface facilities.

3. COG seeks to minimize cost and surface disturbance by consolidating facilities and commingling production from existing and future wells in the proposed non-standard spacing unit. To allow the proposed wells to be dedicated to a federal Communitization Agreement, COG requires approval of a corresponding non-standard horizontal well spacing unit in the Wolfcamp formation.

4. Applicant seeks to initially dedicate the non-standard horizontal spacing unit to the proposed **Bat Bomb Fed Com 401H** “U-Turn” well, to be drilled from a surface location in the Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31, a first take point in Lot 4 (SW/4 SW/4 equivalent) of irregular Section 30 and a last take point in Lot 3 (NW/4 SW/4 equivalent) of irregular Section 30; **Bat Bomb Fed Com 402H** “U-Turn” well, to be drilled from a surface location in the Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31, a first take point in Lot 2 (SW/4 NW/4 equivalent) of irregular Section 31 and a last take point in Lot 3 (NW/4 SW/4 equivalent) of irregular Section 31; **Bat Bomb Fed Com 421H** “U-Turn” well, to be drilled from a surface location in the Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31, a first take point in Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31 and a last take point in Lot 4 (SW/4 SW/4 equivalent) of irregular Section 30; and **Bat Bomb Fed Com 422H** “U-Turn” well, to be drilled from a surface location in the Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31, a first take point in Lot 2 (SW/4 NW/4 equivalent) of irregular Section 31 and a last take point in Lot 4 (SW/4 SW/4 equivalent) of irregular Section 30.

5. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all the working interest owners in the subject spacing unit.

6. Approval of the non-standard unit is necessary to allow COG to efficiently locate surface facilities for the recovery of oil and gas underlying the subject lands, reduce surface disturbance, and lower operating costs.


7. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

WHEREFORE, Applicant requests that this matter be set for hearing before an Examiner of the Oil Conservation Division on February 13, 2025, and, after notice and hearing as required by law, the Division enter an order:

- A. Approving the proposed non-standard spacing unit;
- B. Pooling all uncommitted interests in the horizontal spacing unit and approving the initial wells thereon;
- C. Designating Applicant as operator of the horizontal spacing unit and the horizontal wells to be drilled thereon;
- D. Authorizing Applicant to recover its costs of drilling, equipping, and completing the wells;
- E. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells against any working interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

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ATTORNEYS FOR COG OPERATING LLC

CASE _____ : **Application of COG Operating LLC for Approval of a Non-Standard 947-Acre Horizontal Well Spacing Unit, Eddy County, New Mexico.** Applicant in the above-styled cause seeks to (a) approving a 947-acre, more or less, non-standard horizontal well spacing unit in the Wolfcamp formation underlying Lots 3-4, E/2 SW/4, and SE/4 (S/2 equivalent) of irregular Section 30 and all of irregular Section 31, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico and (b) pooling all uncommitted interests in this acreage. This spacing unit will be initially dedicated to the proposed **Bat Bomb Fed Com 401H** “U-Turn” well, to be drilled from a surface location in the Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31, a first take point in Lot 4 (SW/4 SW/4 equivalent) of irregular Section 30 and a last take point in Lot 3 (NW/4 SW/4 equivalent) of irregular Section 30; **Bat Bomb Fed Com 402H** “U-Turn” well, to be drilled from a surface location in the Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31, a first take point in Lot 2 (SW/4 NW/4 equivalent) of irregular Section 31 and a last take point in Lot 3 (NW/4 SW/4 equivalent) of irregular Section 31; **Bat Bomb Fed Com 421H** “U-Turn” well, to be drilled from a surface location in the Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31, a first take point in Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31 and a last take point in Lot 4 (SW/4 SW/4 equivalent) of irregular Section 30; and **Bat Bomb Fed Com 422H** “U-Turn” well, to be drilled from a surface location in the Lot 1 (NW/4 NW/4 equivalent) of irregular Section 31, a first take point in Lot 2 (SW/4 NW/4 equivalent) of irregular Section 31 and a last take point in Lot 4 (SW/4 SW/4 equivalent) of irregular Section 30. Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs thereof, the operating costs and charges for supervision, the designation of applicant as operator of the proposed spacing unit, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 7 miles west of Loving, New Mexico.