

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

**APPLICATION OF COG OPERATING LLC
FOR COMPULSORY POOLING AND APPROVAL
OF NON-STANDARD, OVERLAPPING SPACING
UNIT, LEA COUNTY, NEW MEXICO.**

CASE NO. 24831

**APPLICATION OF COG OPERATING LLC
FOR COMPULSORY POOLING AND
APPROVAL OF NON-STANDARD SPACING
UNIT, LEA COUNTY, NEW MEXICO.**

CASE NO. 24832

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

COG Operating LLC

ATTORNEYS

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INTERESTED PARTY

Avant Operating, LLC

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STATEMENT OF THE CASES

In **Case No. 24831**, COG applies for an order pooling all uncommitted interests in the Bone Spring formation underlying a 1,920-acre, more or less, non-standard, overlapping horizontal spacing unit comprised of Sections 22, 27 and 34, Township 20 South, Range 33 East, Lea County, New Mexico. COG seeks to dedicate the unit to the following proposed wells:

- a) **Donkey Potroast Fed Com 501H** well, which will produce from a first take point in the NW/4 NW/4 (Unit D) of Section 22 to a last take point in the SW/4 SW/4 (Unit M) of Section 34;
- b) **Donkey Potroast Fed Com 502H** well, which will produce from a first take point in the NE/4 NW/4 (Unit C) of Section 22 to a last take point in the in the SE/4 SW/4 (Unit N) of Section 34;
- c) **Donkey Potroast Fed Com 503H** well, which will produce from a first take point in the NW/4 NE/4 (Unit B) of Section 22 to a last take point in the SW/4 SE/4 (Unit O) of Section 34; and
- d) **Donkey Potroast Fed Com 504H** well, which will produce from a first take point in the NE/4 NE/4 (Unit A) of Section 22 to a last take point in the SE/4 SE/4 (Unit P) of Section 34.

The unit will partially overlap with the spacing units for the following wells, which produce from the Teas; Bone Spring Pool (Code 58960): Outlaw 22 Federal Com #1H well (API No. 30-025-26241), which is located in Section 22, Township 20 South, Range 33 East, Lea County; and Wish Federal #1 well (API No. 30-025-26241), which is located in Section 27, Township 20 South, Range 33 East, Lea County.

In **Case No. 24832**, COG applies for an order pooling all uncommitted interests in the Wolfcamp formation underlying a 1,920-acre, more or less, non-standard, horizontal spacing unit comprised of Sections 22, 27 and 34, Township 20 South, Range 33 East, Lea County, New Mexico. COG seeks to dedicate the Unit to the following proposed wells:

- a) **Donkey Potroast Fed Com 701H** well, which will produce from a first take point in the NW/4 NW/4 (Unit D) of Section 22 to a last take point in the SW/4 SW/4 (Unit M) of Section 34;
- b) **Donkey Potroast Fed Com 702H** well, which will produce from a first take point in the NE/4 NW/4 (Unit C) of Section 22 to a last take point in the in the SE/4 SW/4 (Unit N) of Section 34;
- c) **Donkey Potroast Fed Com 703H** well, which will produce from a first take point in the NW/4 NE/4 (Unit B) of Section 22 to a last take point in the SW/4 SE/4 (Unit O) of Section 34; and
- d) **Donkey Potroast Fed Com 704H** well, which will produce from a first take point in the NE/4 NE/4 (Unit A) of Section 22 to a last take point in the SE/4 SE/4 (Unit P) of Section 34.

The completed intervals of the wells will be orthodox. Applicant seeks approval of non-standard horizontal spacing units in both cases to reduce surface, economic, and environmental impacts and thereby prevent waste. Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Michael Monju	Landman	Affidavit	Approx. 8
William Schellenbach	Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Applicant intends to consolidate these cases for hearing and will present the cases by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2025, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 428854

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 428854
	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>