



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

July 18, 2005

**Mark E. Fesmire, P.E.**  
Director  
Oil Conservation Division

**COG Operating, L.L.C.**  
**Fasken Center, Tower II**  
**550 W. Texas Ave., Suite 1300**  
**Midland, Texas 79701**

**Attention: Jan Preston Spradlin, CPL**  
**Senior Landman**

**Re:** *Administrative application for an exception to the well location provisions of the Southeast Hat Mesa-Delaware Pool (97210) for COG Operating, L.L.C.'s existing Minis "1" Federal Well No. 41 (API No. 30-025-36956) recently drilled at an unorthodox oil well location 2310 feet from the North line and 330 feet from the West line (Lot 5/Unit E) of Irregular Section 1, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico, within Lots 3, 4, 5, and 6 of Irregular Section 1, being a standard 157.66-acre oil spacing and proration unit for this pool.*

Dear Ms. Spradlin:

This letter acknowledges the above-described administrative application received by the Division on June 30, 2005 and assigned *administrative application reference No. pMES0-519941451*. Please refer to this number in future correspondence with the Division.

My preliminary review indicates your application may be incomplete with respect to notice. Please refer to Division Rule 1207.A (2) (a) which reads:

“(2) Unorthodox Well Locations: [1-1-87...2-1-96; Rn, 19 NMAC 15.N.1207.A. (5), 7-15-99; A, 7-15-99]

(a) Definition: “Affected persons” are the following persons owning interests in the adjoining spacing units:

- (i) the Division-designated operator;
- (ii) in the absence of an operator, any lessee whose interest is evidenced by a written document of conveyance either of record or known to the applicant as of the date the application is filed; and
- (iii) in the absence of an operator or lessee, any mineral interest owner whose interest is evidenced by a written document of conveyance either of record or known to the applicant as of the date the application was filed.

In the event the operator of the proposed unorthodox well is also the operator of an existing adjoining spacing unit and ownership is not common between the adjoining spacing unit and the spacing unit containing the proposed unorthodox well, then "affected persons" include all working interest owners in that spacing unit. [1-1-87...2-1-96; N, 7-15-99]"

The subject well not only encroaches the existing Delaware producing well, Samson Resources Company's Minis "2" Federal Well No. 1 (API No. 30-025-34449) and corresponding 160-acre unit to the southwest comprising Lots 9, 10, 15, and 16 of Irregular Section 2, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. It also encroaches upon the two potential 160-acre, more or less, Delaware oil spacing units to the west comprising Lots 1, 2, 7, and 8 of Irregular Section 2 and to the south comprising Lots 11, 12, 13, and 14 of Irregular Section 1.

Please identify all working interest within both these two potential proration units and provide the Division with the required proof of notice.

Since the submitted information is insufficient to review, the application was ruled as incomplete on July 18, 2005. Please submit the above stated information by Thursday, July 28, 2005.

The Division cannot proceed with your application until the required information is submitted. Upon receipt, the Division will continue to process your application. The additional information can be: (i) faxed to (505) 476-3462; (ii) e-mailed to "[michael.stogner@state.nm.us](mailto:michael.stogner@state.nm.us)"; or (iii) mailed to the address shown above.

Should you have any questions concerning this matter, please contact your legal counsel, Mr. James Bruce in Santa Fe at (505) 982-2043.

Sincerely,



Michael E. Stogner  
Engineer

cc: New Mexico Oil Conservation Division – Hobbs  
U. S. Bureau of Land Management - Carlsbad  
William F. Carr, Legal Counsel for Samson Resources Company – Santa Fe  
James Bruce, Legal Counsel for COG Operating, L.L.C. – Santa Fe

*newsuspense date 8-17-2005*

 Attachments can contain viruses that may harm your computer. Attachments may not display correctly.

The sender of this message has requested a read receipt. [Click here to send a receipt.](#)

**Stogner, Michael, EMNRD**

**From:** Jan Spradlin [JSpradlin@conchoresources.com] **Sent:** Thu 7/28/2005 4:19 PM  
**To:** Stogner, Michael, EMNRD  
**Cc:**  
**Subject:** Administrative Application No. pMES0-519941451  
**Attachments:**  [minis\\_stogner.pdf\(3MB\)](#)

Dear Mr. Stogner,

Attached please find information with regard to the above-referenced application. Information was also sent by fax.

Jan

*Jan Preston Spradlin, CPL*

*Senior Landman*

*COG Oil & Gas LP/COG Operating LLC*

*Fasken Center, Tower II*

*550 West Texas Avenue, Suite 1300*

*Midland, Texas 79701*

*Main: 432.683.7443*

*Fax: 432.683.7441*

*Direct: 432.685.4352*

[jspradlin@conchoresources.com](mailto:jspradlin@conchoresources.com)

Fasken Center, Tower II  
550 W. Texas Avenue, Suite 1300  
Midland, Texas 79701  
432.683.7441 main  
432.683.7443 fax

**COG OPERATING LLC**

# Fax

<b>To:</b> Michael E. Stogner	<b>From:</b> Jan Spradlin
<b>Fax:</b> 505-476-3462	<b>Pages:</b> 6
<b>Phone:</b> 505-476-3440	<b>Date:</b> July 28, 2005
<b>Re:</b> Administrative Application reference No. pMES0-519941451	<b>cc:</b> Mr. Jim Bruce 505-982-2151 (fax)

**Urgent**     **For Review**     **Please Comment**     **Please Reply**     **Please Recycle**

• **Comments:**

Mr. Stogner,

Pursuant to your letter of July 18, 2005, received on July 21, 2005 by our office, enclosed please find notice letters which have been faxed and mailed to the operators of record for the adjoining spacing units which could or possibly have Delaware production offsetting our Minis well (30-025-36956). Nearburg controls Lots 11, 12, 13 and 14 of Irregular Section 1 under O/A dated 4/12/96 of which a portion was term assigned to COG for the drilling of its well and Samson as operator and owner of Lots 1, 2, 7 and 8 of Irregular Section 2 has already by fax returned their waiver.

Should you have any questions or should you require any additional information, please do not hesitate to contact me. Thank you for your patience.

Jan

*Jan Preston Spradlin, CPL*  
Senior Landman  
Concho Resources, Inc./COG Operating LLC  
Direct: 432.685.4352  
Land Fax: 432.685.4398  
[jspradlin@conchoresources.com](mailto:jspradlin@conchoresources.com)

## COG OPERATING LLC

Fasken Center, Tower II  
550 W. Texas Avenue, Suite 1300  
Midland, Texas 79701

July 27, 2005

Certified Mail – Return Receipt Requested

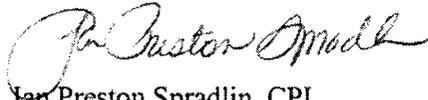
Samson Resources Company  
Centennial Tower  
200 N. Loraine, Suite 1010  
Midland, Texas 79701  
Attention: Rita A. Buress, Senior Landman

Dear Ms. Buress:

Enclosed is a copy of an application, filed with the New Mexico Oil Conservation Division by COG Operating LLC, requesting approval of an unorthodox oil well location in the Delaware formation located in the most northerly northwest quarter of irregular Section 1, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. As an offset operator, you have the right to object to the application. Any objection must be in writing and filed with Division (1220 South St. Francis Drive, Santa Fe, New Mexico 87505) no later than 20 days from the date of this letter. Failure to object will preclude you from contesting this matter at a later date. However, should you not oppose our application for an unorthodox location, please so indicate in the space provided below and fax to the undersigned at 432-685-4398.

Very truly yours,

**COG Operating LLC**



Jan Preston Spradlin, CPL  
Senior Landman

Samson Resources Company has no objection to COG Operating LLC's request for an unorthodox location.

By: \_\_\_\_\_  
Printed Name: \_\_\_\_\_  
Its: \_\_\_\_\_

Enclosures

**COG OPERATING LLC**

Fasken Center, Tower II  
550 W. Texas Avenue, Suite 1300  
Midland, Texas 79701

July 27, 2005

Certified Mail - Return Receipt Requested

Samson Resources Company  
Centennial Tower  
200 N. Lorraine, Suite 1010  
Midland, Texas 79701  
Attention: Rita A. Buress, Senior Landman

Dear Ms. Buress:

Enclosed is a copy of an application, filed with the New Mexico Oil Conservation Division by COG Operating LLC, requesting approval of an unorthodox oil well location in the Delaware formation located in the most northerly northwest quarter of irregular Section 1, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. As an offset operator, you have the right to object to the application. Any objection must be in writing and filed with Division (1220 South St. Francis Drive, Santa Fe, New Mexico 87505) no later than 20 days from the date of this letter. Failure to object will preclude you from contesting this matter at a later date. However, should you not oppose our application for an unorthodox location, please so indicate in the space provided below and fax to the undersigned at 432-685-4398.

Very truly yours,

COG Operating LLC



Jan Preston Spradlin, CPL  
Senior Landman

Samson Resources Company has no objection to COG Operating LLC's request for an unorthodox location.

By: Rita A. Buress  
Printed Name: RITA A. BURESS  
Its: Senior Landman

Enclosures

Confirmation Services	Package ID: 9171082133393140099908	E-CERTIFIED
	Destination ZIP Code: 79701	FIRST CLASS
	Recipient: <u>SAMSON</u>	PBP Account #: 41592288
	Address: _____	Serial #: 2348158
		JUL 28 2005 1:18P

## COG OPERATING LLC

Fasken Center, Tower II  
550 W. Texas Avenue, Suite 1300  
Midland, Texas 79701

July 25, 2005

Certified Mail – Return Receipt Requested

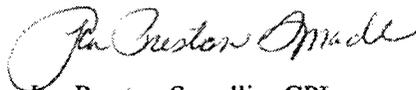
Nearburg Exploration Company, L.L.C.  
3300 North "A" Street  
Building 2, Suite 120  
Midland, Texas 79705  
Attention: Mr. Duke Roush

Gentlemen:

Enclosed is a copy of an application, filed with the New Mexico Oil Conservation Division by COG Operating LLC, requesting approval of an unorthodox oil well location in the Delaware formation located in the most northerly northwest quarter of irregular Section 1, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. As an offset operator, you have the right to object to the application. Any objection must be in writing and filed with Division (1220 South St. Francis Drive, Santa Fe, New Mexico 87505) no later than 20 days from the date of this letter. Failure to object will preclude you from contesting this matter at a later date. However, should you not oppose our application for an unorthodox location, please so indicate in the space provided below and fax to the undersigned at 432-685-4398.

Very truly yours,

**COG Operating LLC**



Jan Preston Spradlin, CPL  
Senior Landman

Nearburg Exploration Company LLC has no objection to COG Operating LLC's request for an unorthodox location.

By: \_\_\_\_\_  
Printed Name: \_\_\_\_\_  
Its: \_\_\_\_\_

Enclosures

Confirmation Services	Package ID: 9171082133393140099915	E-CERTIFIED
	Destination ZIP Code: 79705	FIRST CLASS
	Recipient: <u>NEARBURG</u>	PBP Account #: 41592288
	Address: _____	Serial #: 2348156
		JUL 26 2005 1:18P

Confirmation Report - Memory Send

Page : 001  
Date & Time: 07-28-05 05:01pm  
Line 1 : +4326854398  
Line 2 : +  
Machine ID : Concho Land

Job number : 171  
Date : 07-28 04:58pm  
To : 180215054763462  
Number of pages : 006  
Start time : 07-28 04:58pm  
End time : 07-28 05:01pm (Resend time : 07-28 06:01pm)  
Pages sent : 000  
Status : 50  
Job number : 171 \*\*\* SEND FAILED \*\*\*

Fasken Center, Tower II  
660 W. Texas Avenue, Suite 1300  
Midland, Texas 79701  
432.683.7441 main  
432.683.7443 fax



Fax

To: Michael E. Stogner From: Jan Spradlin  
Fax: 505-476-3462 Pages: 1  
Phone: 505-476-3440 Date: July 28, 2005  
Re: Administrative Application reference cc: Mr. Jim Bruce  
No. pMESO-619941461 505-982-2151 (fax)

Urgent  For Review  Please Comment  Please Reply  Please Recycle

Comments:

Mr. Stogner,

Pursuant to your letter of July 18, 2005, received on July 21, 2005 by our office, enclosed please find notice letters which have been faxed and mailed to the operators of record for the adjoining spacing units which could or possibly have Delaware production offsetting our Mthis well (30-026-36956). Nearburg controls Lots 11, 12, 13 and 14 of Irregular Section 1 under O/A dated 4/12/96 of which a portion was term assigned to COG for the drilling of its well and Samson as operator and owner of Lots 1, 2, 7 and 8 of Irregular Section 2 has already by fax returned their waiver.

Should you have any questions or should you require any additional information, please do not hesitate to contact me. Thank you for your patience.

Jan

Jan Preston Spradlin, CPL  
Senior Landman  
Concho Resources, Inc./COG Operating LLC  
Direct: 432.685.4352  
Land Fax: 432.685.4398  
jspradlin@conchoresources.com

Confirmation Report - Memory Send

Page : 001  
Date & Time: 07-28-05 05:01pm  
Line 1 : +4326854398  
Line 2 : +  
Machine ID : Concho Land

Job number : 172  
Date : 07-28 04:58pm  
To : 80215059822151  
Number of pages : 006  
Start time : 07-28 04:59pm  
End time : 07-28 05:01pm  
Pages sent : 006  
Status : OK  
Job number : 172

\*\*\* SEND SUCCESSFUL \*\*\*

Pecken Center, Tower II  
600 W. Texas Avenue, Suite 1300  
Midland, Texas 79701  
432.685.7441 main  
432.685.7443 fax



# Fax

<b>To:</b> Michael E. Stogner	<b>From:</b> Jan Spradlin
<b>Fax:</b> 505-476-3462	<b>Pages:</b> 1
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Urgent     For Review     Please Comment     Please Reply     Please Recycle

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Pursuant to your letter of July 18, 2005, received on July 21, 2005 by our office, enclosed please find notice letters which have been faxed and mailed to the operators of record for the adjoining spacing units which could or possibly have Delaware production offsetting our Minis well (30-025-38956). Nearburg controls Lots 11, 12, 13 and 14 of Irregular Section 1 under O/A dated 4/12/86 of which a portion was term assigned to COG for the drilling of its well and Samson as operator and owner of Lots 1, 2, 7 and 8 of Irregular Section 2 has already by fax returned their waiver.

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