

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

**APPLICATION OF COTERRA ENERGY OPERATING CO.  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

**CASE NO. 25181**

**COTERRA'S PRE-HEARING STATEMENT**

Coterra Energy Operating Co. (formerly known as Cimarex Energy Co.) ("Coterra"), and its subsidiaries, including but not limited to, Magnum Hunter Production, Inc. ("MHPI") and Cimarex Energy Co. of Colorado ("Cimarex"), (OGRID No. 215099) ("Applicant" or "Coterra"), the Applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Coterra Energy Operating Co.

**ATTORNEY**

Benjamin B. Holliday  
107 Katherine Court  
San Antonio, Texas 78209  
Phone: (210) 469-3197  
Email: [ben@helg.law](mailto:ben@helg.law)

**RESPONDENT**

EOG Resources

Jordan J. Kessler  
125 Lincoln Avenue, Suite 213  
Santa Fe, New Mexico 7501  
Email: [Jordan\\_kessler@eogresources.com](mailto:Jordan_kessler@eogresources.com)

**APPLICANT’S STATEMENT OF THE CASE**

In Case No. 25181, Coterra seeks an order pooling all uncommitted interests within an interval of the Bone Spring Formation from the top of the Bone Spring formation to the correlative stratigraphic equivalent of 7,680 feet measured depth as shown in the dual laterolog of the Wigeon 23 Federal Com 2 (API# 30-015-33684), (“Formation Interval”), designated as an oil pool – the WILDCAT G-04 S252623M; BONE SPRING Pool (Pool Code No. 27916) – underlying a standard 640-acre, more or less, horizontal well spacing unit comprised of the E2 of Sections 23 and 26, Township 25 South, Range 26 East, N.M.P.M., Eddy County, New Mexico. Applicant seeks to initially dedicate this horizontal spacing unit to the proposed Wigeon 23-26 Fed Com #3H and #5H wells (“Wells”):

- i. **Wigeon 23-26 Federal Com 3H**, API No. 30-015-55893 which is an oil well that will be horizontally drilled from the surface hole location in the E/2 of Section 23, Township 25 South, Range 26 East, being approximately 385 feet FNL, and approximately 1,665 feet FEL of Section 23, Township 25 South, Range 26 East, with a first take-point located 2,305 feet FEL and 100 feet FNL of Section 23, Township 25 South, Range 26 East, to a bottom hole location in the E/2 of Section 26, Township 25 South, Range 26 East, being approximately 100 feet FSL, and approximately 2,305 feet FEL of Section 26, Township 25 South, Range 26 East;
- ii. **Wigeon 23-26 Federal Com 5H**, API No. 30-015-55915 which is an oil well that will be horizontally drilled from the surface hole location in the E/2 of Section 23, Township 25 South, Range 26 East, being approximately 399 feet FNL, and approximately 1,650 feet FEL of Section 23, Township

25 South, Range 26 East, with a first take-point located 1,294 feet FEL and 100 feet FNL of Section 23, Township 25 South, Range 26 East, to a bottom hole location in the E/2 of Section 26, Township 25 South, Range 26 East, being approximately 100 feet FSL, and approximately 1,294 feet FEL of Section 26, Township 25 South, Range 26 East.

The completed interval for each well will be orthodox and comply with statewide setbacks for oil wells. Coterra has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject acreage.

**APPLICANTS PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Keaton Curtis, Landman	Affidavit	Approximately 5
Cahill Kellagahn, Geologist	Affidavit	Approximately 5

**PROCEDURAL MATTERS**

Coterra intends to present this case by affidavit if there is no opposition at the time of the hearing.

Respectfully submitted,

HOLLIDAY ENERGY LAW GROUP, PC

/s/ Benjamin B. Holliday

Benjamin B. Holliday

107 Katherine Court, Suite 100

San Antonio, Texas 78209

Phone: (210) 469-3197

ben@helg.law

*Counsel for Avant Operating, LLC*

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 440158

**QUESTIONS**

Operator: CIMAREX ENERGY CO. 6001 Deauville Blvd Midland, TX 79706	OGRID: 215099
	Action Number: 440158
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>