MAR 28 2019 FX02:55

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

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

CASE NO. 20335

COG'S PRE-HEARING STATEMENT

COG Operating LLC ("COG"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

<u>APPLICANT</u>

COG Operating LLC One Concho Center 600 W. Illinois Avenue Midland, Texas 79701

<u>ATTORNEY</u>

Michael H. Feldewert, Esq. Adam G. Rankin, Esq. Julia Broggi, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile

APPLICANT'S STATEMENT OF CASE

COG seeks an order pooling all uncommitted interests in the Bone Spring formation (Hay Hollow; Bone Spring North Pool (30216)) underlying a 640-acre standard horizontal spacing unit comprised of the W/2 of Sections 24 and 25, Township 25 South, Range 27 East, Eddy County, New Mexico. COG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

• The Daisy 24 State Com 501H well to be drilled from a surface hole location in NW/4 NW/4 (Unit D) of Section 24 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 25.

- The Daisy 24 State Com 502H well to be drilled from a surface hole location in NW/4 NW/4 (Unit D) of Section 24 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 25.
- The Daisy 24 State Com 503H well to be drilled from a surface hole location in NE/4 NW/4 (Unit C) of Section 24 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 25.
- The Daisy 24 State Com 504H well to be drilled from a surface hole location in NW/4 NW/4 (Unit C) of Section 24 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 25.

The completed interval for the proposed **Daisy 24 State Com 503H** will be within 330' of the quarter-quarter line separating the W/2 W/2 and the E/2 W/2 of Sections 24 and 25 to allow inclusion of this acreage in a standard 640-acre horizontal well spacing unit. Since the proposed wells will be simultaneously drilled and completed, COG requests an extension of the time period to drill and complete the initial well from 120 days to 365 days.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Travis Macha, Landman	Via Affidavit	Approx. 5
Travis Sparks, Geologist	Via Affidavit	Approx. 4

PROCEDURAL MATTERS

Since COG is not aware of any opposition to this pooling application, this matter will be presented by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC

jbroggi@hollandhart.com