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

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

**CASE NO. 20337** 

# COG'S SECOND AMENDED PRE-HEARING STATEMENT

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

## **APPEARANCES**

#### APPLICANT

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

#### **ATTORNEY**

Michael H. Feldewert, Esq. Adam G. Rankin, Esq. Julia Broggi, Esq. Kaitlyn A. Luck, 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 Wolfcamp formation [Purple Sage; Wolfcamp (Gas) Pool] underlying a 640-acre horizontal spacing unit comprised of the E/2 of Sections 24 and 25, Township 24 South, Range 27 East, Eddy County, New Mexico. This horizontal spacing unit will be dedicated to the following proposed initial wells:

• The **Quien Sabe Fed Com No. 602H Well** to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 24 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 25.

• The Quien Sabe Fed Com No. 603H Well, and the Quien Sabe Fed Com 801H Well to be horizontally drilled from a common surface location in the NW/4 NE/4 (Unit B) of Section 24 to bottom hole locations in the SW/4 SE/4 (Unit O) of Section 25.

Due to a change in COG's development plan, COG is no longer seeking to dedicate the following wells to this spacing unit: Quien Sabe Fed Com No. 601H, Quien Sabe Fed Com No. 701H, Quien Sabe Fed Com No. 702H Well, and Quien Sabe Fed Com No. 703H. The completed interval for these wells will remain within the standard setback as required by the Special Rules for the Purple Sage; Wolfcamp (Gas) Pool.

## **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

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