

**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 NOS. 20934 & 20935

COG'S CONSOLIDATED PRE-HEARING STATEMENT

COG Operating LLC ("COG") (OGRID No. 229137), applicant in the above-referenced cases, submits this consolidated Pre-Hearing Statement, pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

COG Operating LLC
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ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In **Case No. 20934**, COG seeks an order pooling all uncommitted interests in the Wolfcamp (Purple Sage; Wolfcamp (Gas) (Pool code 98220)) formation underlying a standard 767.72-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 22 and 27, and the N/2 NE/4 and Lots 3-4 (E/2 equivalent) of irregular Section 34, Township 26 South, Range 28 East, Eddy County, New Mexico. COG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed initial wells:

- the **Potato Baby State Com #701H well** and the **Potato Baby State Com #702H well**, both of which will be drilled from a common surface hole location in NE/4 NE/4 (Unit A) of Section 22 to bottom hole locations in the SE/4 NE/4 (Lot 4) of Section 34; and
- the **Potato Baby State Com #703H well**, to be drilled from a surface hole location in NW/4 NE/4 (Unit B) of Section 22 to a bottom hole location in the SW/4 NE/4 (Lot 3) of Section 34.

The completed interval for the proposed wells will comply with the setback requirements of the Special Rules for the Purple Sage Wolfcamp Pool.

In **Case No. 20935**, COG seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 767.52-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 22 and 27, and the N/2 NW/4 and Lots 1-2 (W/2 equivalent) of irregular Section 34, Township 26 South, Range 28 East, Eddy County, New Mexico. COG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed initial wells:

- the **Potato Baby State Com #704H well** to be drilled from a surface hole location in NE/4 NW/4 (Unit C) of Section 22 to a bottom hole location in the SE/4 NW/4 (Lot 2) of Section 34; and
- the **Potato Baby State Com #705H well** and the **Potato Baby State Com #706H well**, both of which are to be drilled from a common surface hole location in NW/4 NW/4 (Unit D) of Section 22 to a bottom hole location in the SW/4 NW/4 (Lot 1) of Section 34.

The completed interval for the proposed wells will comply with the setback requirements of the Special Rules for the Purple Sage Wolfcamp Pool.

APPLICANT'S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|---------------------------------------|-----------------------|-----------------|
| Travis Macha, Landman | Affidavit | Approx. 5 |
| Travis Sparks, Geologist | Affidavit | Approx. 3 |

PROCEDURAL MATTERS

COG respectfully requests that these cases be consolidated for purposes of hearing and COG intends to present these cases by affidavit if uncontested at time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



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