

**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. 20927

EOG RESOURCES, INC.'S CONSOLIDATED PRE-HEARING STATEMENT

EOG Resources, Inc. ("EOG") hereby submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

COG Operating LLC

ATTORNEY

Ocean Munds-Dry
William F. Carr
Elizabeth A. Ryan
Michael Rodriguez
COG Operating LLC
1048 Paseo de Peralta
Santa Fe, New Mexico 87501

OPPONENT

EOG Resources, Inc.

ATTORNEY

Earl E. DeBrine, Jr.
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STATEMENT OF THE CASE

In **Case No. 20927**, COG Operating LLC seeks an order from the division pooling all uncommitted interest owners in the Wolfcamp formation underlying a standard 1280-acre, more or less, horizontal spacing unit comprised of all of Sections 10 and 3, Township 26 South, Range

29 East, NMPM, Eddy County, New Mexico. COG Operating LLC seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The **Rock Jelly Fed Com 701H** well to be horizontally drilled from a surface hole location in the NE/4NE/4 (Unit A) of Section 3 to a bottom hole location in the SE/4SE/4 (Unit P) of Section 10,
- The **Rock Jelly Fed Com 702H** well to be horizontally drilled from a surface hole location in the NE/4NE/4 (Unit A) of Section 3 to a bottom hole location in the SW/4SE/4 (Unit O) of Section 10,
- The **Rock Jelly Fed Corn 703H** well to be horizontally drilled from a surface hole location in the NE/4NW/4 (Unit C) of Section 3 to a bottom hole location in the SE/4SW/4 (Unit N) of Section 10,
- The **Rock Jelly Fed Com 704H** well to be horizontally drilled from a surface hole location in the NE/4NW/4 (Unit C) of Section 3 to a bottom hole location in the SE/4SW/4 (Unit N) of Section 10,
- The **Rock Jelly Fed Com 705H** well to be horizontally drilled from a surface hole location in the NE/4NW/4 (Unit C) of Section 3 to a bottom hole location in the SW/4SW/4 (Unit M) of Section 10.

EOG, an opponent in this case filed by COG Operating LLC (“Concho”), owns acreage in the proposed 1280-acre spacing unit that COG Operating LLC seeks to force pool and has its own competing proposal for development of a 1280-acre spacing unit comprised of all of Sections 10 and 15, Township 26 South, Range 29 East, NMPM, Eddy County, New Mexico. EOG opposes Concho’s application in this case because an order pooling EOG’s acreage to form a 1280-acre spacing unit for Concho’s proposed Rock Jelly wells violates EOG’s correlative rights and causes waste. EOG is filing an application for compulsory pooling and this case should be heard in conjunction with the hearing involving EOG’s competing development plan.

PROPOSED EVIDENCE

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Chloe Sawtelle – Landman	Approx. 20	Approx. 5
Brandon Swain – Geologist	Approx. 20	Approx. 4
Marielle Spinks – Engineer	Approx. 20	Approx. 5

PROCEDURAL MATTERS

EOG has requested that the February 20, 2020 hearing be continued.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following
counsel of record by electronic mail on February 13, 2020:

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By: _____

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