

**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. 21259-21260

COG'S CONSOLIDATED PRE-HEARING STATEMENT

COG Operating LLC ("COG") (OGRID No. 229137), the applicant in the above-referenced cases, submits this 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

OTHER PARTIES

Chevron U.S.A. Inc.
1400 Smith Street
Houston, Texas 77002

Earl E. DeBrine, Jr.
Deana M. Bennett
Lance D. Hough
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, COG seeks orders pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool [98220]) underlying standard 960-acre, more or less, horizontal spacing units comprised of the E/2 and the W/2 of Sections 24, 25, and 36, Township 25 South, Range 27 East, Eddy County, New Mexico.

Under **Case 21259**, COG seeks to form and initially dedicate the E/2 spacing unit to the following proposed initial wells:

- The **Atticus State Com #701H** well (API No. 30-015-46869) to be drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 24;
- The **Atticus State Com #702H** well (API No. 30-015-46873) to be drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 24; and
- The **Atticus State Com #703H** well (API No. 30-015-46870), to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 36 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 24.

Under **Case 21260**, COG seeks to form and initially dedicate the W/2 spacing unit to the following proposed initial wells:

- The **Atticus State Com #704H** well (API No. 30-015-46871), to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 36 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 24; and
- The **Atticus State Com #705H** (API No. 30-015-46872) and **Atticus State Com #706H** (API No. 30-015-46875) wells, both of which will be drilled from a

common surface hole location in the SW/4 SW/4 (Unit M) of Section 36 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 24.

The completed intervals of these wells will comply with the requirements of the Special Rules for the Purple Sage Wolfcamp Gas Pool.

APPLICANT’S PROPOSED EVIDENCE

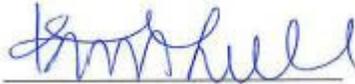
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Lizzy Laufer, Landman	Affidavit	Approx. 6
Chesney Gilleland, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

COG asks that these cases be consolidated for hearing. COG does not anticipate opposition to these pooling applications and therefore intends to present these cases by affidavits.

Respectfully submitted,

HOLLAND & HART LLP



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

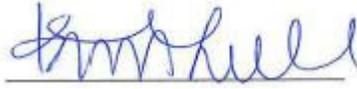
ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Earl E. DeBrine, Jr.
Deana M. Bennett
Lance D. Hough
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
TEL: (505) 848-1800
Email: earl.debrine@modrall.com
deana.bennett@modrall.com
lance.hough@modrall.com

Attorneys for Chevron U.S.A. Inc.



Kaitlyn A. Luck