

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

**APPLICATION OF COG OPERATING LLC  
TO AMEND ORDER NO. R-21450,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 21911**

**APPLICATION OF COG OPERATING LLC  
TO AMEND ORDER NO. R-21451,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 21912**

**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 DeBrine  
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 **Case No. 21911**, COG seeks to amend Order No. R-21450 (“Order”) to allow for an extension of time for drilling the proposed initial well under the Order. Division Order No. R-21450, entered on September 3, 2020, in Case No. 21259, created a standard 960-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 24, 25, and 36, Township 25 South, Range 27 East, NMPM, Eddy County, New Mexico (the “Unit”), and designed COG as operator of the Unit. The Order further pooled the uncommitted interests in the Wolfcamp formation in the Unit, and dedicated the unit to the proposed initial **Atticus State Com #701H well** (API No. 30-015-46869), the **Atticus State Com #702H well** (API No. 30-015-46873), and the **Atticus State Com #703H well** (API No. 30-015-46870). Applicant requests that Order No. R-21450 be re-opened and amended to extend the deadline to commence drilling the well be extended for a year, to September 3, 2022.

In **Case No. 21912**, COG seeks to amend Order No. R-21451 (“Order”) to allow for an extension of time for drilling the proposed initial well under the Order. Division Order No. R-21451, entered on September 3, 2020, in Case No. 21260, created a standard 960-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 24, 25, and 36, Township 25 South, Range 27 East, NMPM, Eddy County, New Mexico (the “Unit”), and designed COG as operator of the Unit. The Order further pooled the uncommitted interests in the Wolfcamp formation in the Unit, and dedicated the unit to the proposed initial **Atticus State Com #704H well** (API No. 30-015-46871), the **Atticus State Com #705H well** (API No. 30-015-46872), and the **Atticus State Com #706H well** (API No. 30-015-46875). Applicant requests that Order No. R-21451 be re-opened and amended to extend the deadline to commence drilling the well be extended for a year, to September 3, 2022.

**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Lizzy Laufer, Landman	Affidavit	Approx. 6

**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 May 26, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Earl E. DeBrine, Jr.  
Modrall, Sperling, Roehl, Harris & Sisk, P.A.  
Post Office Box 2168  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800  
*earl.debrine@modrall.com*

***Attorney for Chevron U.S.A. Inc.***



---

Kaitlyn A. Luck