

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

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IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:

APPLICATION OF COG OPERATING LLC FOR  
A NON-STANDARD SPACING AND PRORATION  
UNIT AND COMPULSORY POOLING, LEA  
COUNTY, NEW MEXICO.

Case No. 15,333

AMENDED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Yates Petroleum Corporation, *et al.* ("Yates") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

COG Operating LLC

APPLICANT'S ATTORNEY

Michael H. Feldewert

OPPONENT

Yates Petroleum Corporation  
Myco Industries, Inc.  
Abo Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210

OPPONENT'S ATTORNEY

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attention: Chuck Moran  
(575) 748-4349

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order forming a 240 acre non-standard spacing and proration unit in the Bone Spring formation comprised of the W/2E/2 of Section 6 and the W/2NE/4 of Section 7, Township 25 South, Range 35 East, N.M.P.M., and pooling all mineral interests in the non-standard unit.

OPPONENT

Yates owns working interests in the proposed well unit. Applicant has not negotiated in good faith to obtain Yates' voluntary joinder in the well unit, and the case should be dismissed.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Chuck Moran  
(landman)

15 min.

Approx. 4

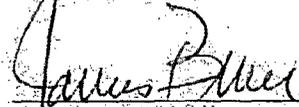
Sterling Fly  
(geologist)

15 min.

Approx. 4

**PROCEDURAL MATTERS**

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Yates Petroleum Corporation,  
Mycó Industries, Inc., and Abo Petroleum  
Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 29<sup>th</sup> day of June, 2015 by e-mail:

Michael H. Feldewert  
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Ocean Munds-Dry  
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James Bruce