

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

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

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FOR A NON-STANDARD SPACING AND  
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RECEIVED OGD  
2011 AUG 24 P 05  
CASE NO. 15810  
CASE NO. 15811

**COG's PRE-HEARING STATEMENT**

COG Operating LLC, the applicant in the above referenced matter, 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.  
Jordan L. Kessler, Esq.  
Holland & Hart, LLP  
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Santa Fe, New Mexico 87504-2208  
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**APPLICANT'S STATEMENT OF CASE**

In Case No. 15810, COG Operating LLC seeks an order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the E/2 W/2 of Section 16 and the E/2 W/2 of Section 21, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Bone Spring formation. COG proposes to dedicate the above-

referenced spacing and proration unit as the project area for the proposed **White Falcon 16 Federal Com No. 11H Well**, which will be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 16 to a standard bottom hole location in the SE/4 SW/4 (Unit N) of Section 21. The completed interval for this well will remain within the statewide setbacks for oil wells.

In Case No. 15811, COG seeks an order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the W/2 W/2 of Section 16 and the W/2 W/2 of Section 21, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Bone Spring formation. COG proposes to dedicate the above-referenced spacing and proration unit as the project area for the proposed **White Falcon 16 State Com No. 12H Well**, which will be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 16 to a non-standard bottom hole location in the SW/4 SW/4 (Unit M) of Section 21. COG has applied administratively for approval of a non-standard location for this well.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Mike Wallace – Landman	Approx. 20	Approx. 12
Carrie Martin – Geologist	Approx. 15	Approx. 6
Jayne Junell – Engineer	Approx. 10	Approx. 4

#### **PROCEDURAL MATTERS**

COG respectfully requests that Case No. 15810 and 15811 be consolidated for hearing.

Respectfully submitted,

HOLLAND & HART LLP



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