# 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.

CASE NOS. 15830 and 15831

## **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		2017	平
<u>APPLICANT</u>	<b>ATTORNEY</b>	OCT	
COG Operating LLC One Concho Center 600 W. Illinois Avenue Midland, Texas 79701	Michael H. Feldewert, Esq. Jordan L. Kessler, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-229 (505) 988-4421	-5 P 4: 17	WED OCD
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# <u>OPPONENT</u> <u>ATTORNEY</u>

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### APPLICANT'S STATEMENT OF CASE

In Case No. 15830, COG Operating LLC seeks an order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the W/2 E/2 of Section 24 and the W/2 E/2 of Section 25, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all

uncommitted interests in the Wolfcamp formation. COG proposes to dedicate the above-referenced spacing and proration unit as the project area for the proposed **Baseball Cap Federal Com No. 24H Well,** which will be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 25 to a standard bottom hole location in the NW/4 NE/4 (Unit B) of Section 24.

In Case No. 15831, COG seeks an order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the E/2 W/2 of Section 24 and the E/2 W/2 of Section 25, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp formation. COG proposes to dedicate the above-referenced spacing and proration unit as the project area for the proposed **Baseball Cap Federal Com No. 26H Well,** which will be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 25 to a standard bottom hole location in the NE/4 NW/4 (Unit C) of Section 24. COG has negotiated in good faith with all parties it seeks to pool for these two cases.

#### APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS	
Matt Solomon – Landman	Approx. 15	Approx. 10	
Henry Zollinger – Geologist	Approx. 10	Approx. 4	

#### **PROCEDURAL MATTERS**

COG respectfully requests that Case No. 15830 and 15831 be consolidated for hearing.

Respectfully submitted,

**HOLLAND & HART LLP** 

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ATTORNEYS FOR COG OPERATING LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2017, I served a copy of the foregoing document to the following counsel of record via electronic mail:

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