

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

**APPLICATION OF CIMAREX ENERGY
COMPANY FOR A NON-STANDARD SPACING
AND PRORATION UNIT AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NO. 15755

AMENDED PRE-HEARING STATEMENT

EOG Resources, Inc. ("EOG") submits this amended pre-hearing statement as required by the Oil Conservation Division Rule 19.15.4.13.B.

APPEARANCES

APPLICANT

Cimarex Energy Co.

ATTORNEY

J. Scott Hall
Post Office Box 2307
Santa Fe, New Mexico 87504
(505) 986-2646
shall@montand.com

OPPONENT

EOG Resources, Inc.
5509 Champions Dr.
Midland, TX 79706

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Jordan L. Kessler
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
Email: mfeldewert@hollandhart.com
Email: agrankin@hollandhart.com
Email: jlkessler@hollandhart.com

RECEIVED OCD
2011 NOV 22 P 3:02

APPLICANT'S STATEMENT OF CASE

Cimarex Energy Co. ("Cimarex") proposes to form a non-standard oil spacing and proration unit comprised of the W/2 of Sections 12 and 13, Township 25 South, Range 28 East, NMPM, Eddy County, New Mexico. Cimarex seeks approval to compulsory pool uncommitted interests in the Wolfcamp formation, and to dedicate the proposed spacing unit to the **Riverbend 12-13 Fed Com No. 29H Well**.

OPPONENT'S STATEMENT OF CASE

EOG Resources, Inc. objects to this application on the basis that (1) Cimarex improperly staked the proposed well on EOG acreage, where EOG has previously planned surface locations; and (2) the U.S. Bureau of Land Management has not given final approval to Cimarex's surface location.

APPLICANT'S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|---------------------------------------|-----------------------|-----------------|
|---------------------------------------|-----------------------|-----------------|

OPPONENT'S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|---------------------------------------|-----------------------|-----------------|
| Charles Bassett, Landman | Approx. 10 minutes | Approx. 2 |
| Steve Munsell, Drilling Engineer | Approx. 10 minutes | Approx. 2 |

PROCEDURAL MATTERS

At a meeting with the BLM on November 20, 2017, EOG and Cimarex agreed on a surface location for Cimarex's well; however, the BLM stated that it will not approve the surface

location until after staking on December 5, 2017. EOG therefore requests a continuance until the BLM has given final approval for Cimarex's surface location.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert
Adam G. Rankin
Jordan L. Kessler
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Facsimile
Email: mfeldewert@hollandhart.com
Email: agrankin@hollandhart.com
Email: jlkessler@hollandhart.com

ATTORNEYS FOR EOG RESOURCES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2017, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

J. Scott Hall
Post Office Box 2307
Santa Fe, New Mexico 87504
(505) 986-2646
shall@montand.com

ATTORNEY FOR CIMAREX ENERGY CO.



Adam G. Rankin