

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

**APPLICATION OF APACHE CORPORATION
FOR APPROVAL OF THE THUNDERBIRD
EXPLORATORY UNIT, EDDY COUNTY,
NEW MEXICO.**

RECEIVED O&D
2018 JAN - 3 P 1 37
CASE NO. 15874

COG's MOTION TO CONTINUE

COG Operating LLC ("COG") moves the Division to continue this matter, currently scheduled for the January 11, 2018, Examiner Hearing docket, to the January 25, 2018, docket. In support of this motion COG states:

1. Applicant seeks an order approving its proposed "Thunderbird Resource Development Unit" comprised of federal and state lands in Eddy County, New Mexico. *See* Application at p. 1. The proposed unitized interval is the stratigraphic equivalent of the top of the Yeso formation encountered at a measured depth of 4,233' down to the stratigraphic equivalent of the top of the Tubb formation at a measured depth of 5,554' as encountered in the Aspen Federal Com #1 well (API No. 30-015-31656) located in NE/4 SW/4, Section 31, Township 16 South, Range 31 East, Eddy County, New Mexico.
2. Applicant's proposed unit boundary seeks to include the S/2 of Section 36, Township 16 South, Range 30 East. COG was not consulted about the boundary of this proposed unit and is the lessee of offsetting oil and gas acreage in the N/2 of Section 36 and in offsetting Section 31 to the East.

3. The Bureau of Land Management ("BLM") has extensive restrictions on the allowable surface locations for development of federal minerals offsetting the proposed unit boundary.

4. Since receipt of Apache's application, COG has undertaken efforts to identify and meet with the BLM about allowable surface locations for development of the acreage offsetting the S/2 of Section 36. COG received notice today that the BLM has scheduled a meeting for Friday, January 5th, to discuss proposed surface locations and development options for acreage offsetting the proposed unit.

5. A two week continuance of this matter will allow time to confer with the BLM about surface locations and development options for the affected acreage offsetting the S/2 of Section 36.

6. The scheduled meeting with the BLM and subsequent BLM decisions will inform on the extent to which inclusion of the S/2 of Section 36 in the proposed unit will strand acreage, impact COG's development plans, infringe on COG's correlative rights, and cause waste.

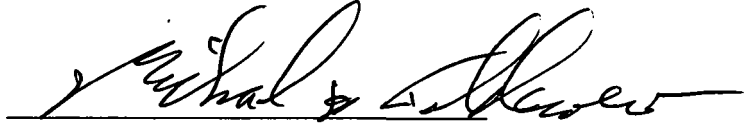
7. A two week continuance of this matter will also afford COG the time necessary to efficiently prepare for hearing following the scheduled BLM meeting and subsequent decisions on the development options for the offsetting acreage.

8. Counsel for the applicant has been contacted and opposes this request for a two-week continuance.

WHEREFORE, COG respectfully requests that the Division continue the hearing in this matter until the January 25, 2018, Examiner Hearing Docket.

Respectfully submitted,

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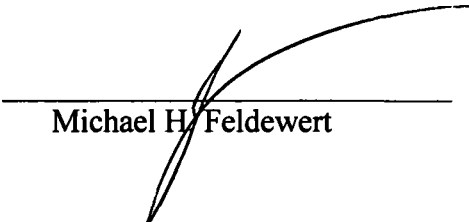
ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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