

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

APR 30 2019 PM03:50

**AMENDED APPLICATION OF COG OPERATING LLC
FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NO. 20337

AMENDED APPLICATION

COG Operating LLC (“COG”), through its undersigned attorneys, hereby files this amended application with the Oil Conservation Division pursuant to the provisions of N.M. Stat. Ann. § 70-2-17, for an order pooling all uncommitted interests in the Wolfcamp formation [Purple Sage; Wolfcamp (Gas) Pool] underlying a 640-acre horizontal spacing unit comprised of the E/2 of Sections 24 and 25, Township 24 South, Range 27 East, Eddy County, New Mexico. In support of its application, COG states:

1. COG Operating LLC (OGRID No. 229137) is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon.
2. COG originally sought to dedicate the above-referenced horizontal spacing unit to the following proposed initial wells:
 - the **Quien Sabe Fed Com No. 601H Well, Quien Sabe Fed Com No. 602H Well,** and the **Quien Sabe Fed Com No. 701H Well** to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 24 to bottom hole location in the SE/4 SE/4 (Unit P) of Section 25; and
 - the **Quien Sabe Fed Com No. 603H Well, Quien Sabe Fed Com No. 702H Well,** and the **Quien Sabe Fed Com No. 703H Well** to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 24 to bottom hole location in the SW/4 SE/4 (Unit O) of Section 25.
3. Under this amended application, COG seeks to add the following initial well to the proposed horizontal spacing unit:

- the **Quien Sabe Fed Com 801H** to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 24 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 25.

4. The proposed wells will comply with the setback requirement imposed by the Special Rules for the Purple Sage; Wolfcamp (Gas) Pool.

5. Because the proposed wells will be simultaneously drilled and completed, COG requests an extension of the time period to drill and complete the initial well from 120 days to 365 days.

6. COG has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject spacing unit.

7. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

8. In order to permit COG to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this horizontal spacing unit should be pooled and COG Operating LLC should be designated the operator of this proposed horizontal wells and spacing unit.

WHEREFORE, COG requests that this amended application be set for hearing before an Examiner of the Oil Conservation Division on May 30, 2019, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the horizontal spacing unit and approving the initial wells;
- B. Authorizing an extension of the 120-day requirement to drill and complete an initial well;
- C. Designating COG Operating LLC operator of this spacing unit and the horizontal wells to be drilled thereon;

- D. Authorizing COG to recover its costs of drilling, equipping and completing the wells;
- E. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% charge for the risk assumed by COG in drilling and completing the well against any working interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

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ATTORNEYS FOR COG OPERATING LLC

CASE 20337: **Amended application of COG Operating LLC for compulsory pooling, Eddy County, New Mexico.** Applicant in the above-styled cause seeks an order pooling all uncommitted interest owners in the Wolfcamp formation underlying a 640-acre horizontal spacing unit comprised of the E/2 of Sections 24 and 25, Township 24 South, Range 27 East, NMPM, Eddy County, New Mexico. COG seeks to dedicate the above-referenced horizontal spacing unit to the following proposed initial wells:

- the **Quien Sabe Fed Com No. 601H Well, Quien Sabe Fed Com No. 602H Well**, and the **Quien Sabe Fed Com No. 701H Well** to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 24 to bottom hole location in the SE/4 SE/4 (Unit P) of Section 25; and
- the **Quien Sabe Fed Com No. 603H Well, Quien Sabe Fed Com No. 702H Well, Quien Sabe Fed Com No. 703H Well** and the **Quien Sabe Fed Com 801H** to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 24 to bottom hole location in the SW/4 SE/4 (Unit O) of Section 25.

Also, to be considered will be the cost of drilling and completing the wells, the allocation of the cost thereof, the actual operating costs and charges for supervision, the designation of COG Operating LLC as operator, and the imposition of a 200% charge for risk involved in drilling and completing each well. Said area is located approximately 5 miles southwest of Malaga, New Mexico.