



**MONTGOMERY
& ANDREWS**

J. SCOTT HALL

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April 9, 2009

Florene Davidson
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

**Re: Application of RSC Resources Limited Partnership to Allow Two
Operators on a Well Unit, Eddy County, New Mexico
NMOCD Case No. 14308**

Dear Ms. Davidson:

Attached for filing is an original and three copies of the following two pleadings:

1. Entry of Appearance
2. Pre-Hearing Statement

I have included an extra copy of each to be conformed.

Thank you.

Very truly yours,

Karen Williams

Karen Williams
Assistant to J. Scott Hall

:kw

Enclosures

{00074952-1}

REPLY TO:

325 Paseo de Peralta
Santa Fe, New Mexico 87501
Telephone (505) 982-3873 • Fax (505) 982-4289

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

APPLICATION OF RSC RESOURCES LIMITED
PARTNERSHIP TO ALLOW TWO OPERATORS ON
A WELL UNIT, EDDY COUNTY, NEW MEXICO

CASE NO. 14,308

ENTRY OF APPEARANCE

Comes now COG Operating LLC by and through its undersigned attorneys,
Montgomery & Andrews, P.A., (J. Scott Hall) and hereby enters its appearance in the
above matter.

MONTGOMERY & ANDREWS, P.A.

By:



J. Scott Hall
Attorneys for COG Operating LLC
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was faxed to
counsel of record on the 9th day of April, 2009, as follows:

James Bruce, Esq.
P. O. Box 1056
Santa Fe, NM 87504
(505) 982-2151 fax

Ocean Munds-Dry, Esq.
Holland & Hart LLP
P.O. Box 2208
Santa Fe, NM 87504-2208
(505) 983-6043



J. Scott Hall

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

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IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:

APPLICATION OF RSC RESOURCES LIMITED
PARTNERSHIP TO ALLOW TWO OPERATORS ON
A WELL UNIT, EDDY COUNTY, NEW MEXICO

Case No. 14,308

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by COG Operating, LLC as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

RSC Resources LP
6824 Island Cr.
Midland, Texas 79709
Attention: Randy S. Cate

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

Three Span Oil and Gas Company, Inc.
400 W. Illinois Ave
Suite 1250
Midland, TX 79701

OPPONENT'S ATTORNEY

Ocean Munds-Dry
Holland & Hart LLP
P. O. Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421

OTHER PARTY

COG Operating, LLC
550 W. Texas Ave.
Suite 100
Midland, TX 79701

OTHER PARTY'S ATTORNEY

J. Scott Hall
Montgomery & Andrews
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
(505) 986-2646

APPLICANT

Applicant seeks an order approving two operators on non-standard oil spacing and proration unit (project area) comprised of Lot 3, NE/4SW/4, and N/2SE/4 (the N/2 S/2 equivalent) of Section 30, Township 16 South, Range 28 East, NMPM, for the horizontal drilling and operation of its proposed Lucky Wolf "30" Fed. Com. Well No. 1 to the Wolfcamp formation.

OTHER PARTY

COG Operating LLC ("COG") is the owner of working interests in the N/2 S/2 of Section 30, T16S R28E and is an interested party. COG does not presently plan to present witnesses at the hearing on April 16, 2009, but reserves the right to do so. COG provisionally identifies its witnesses, below.

OPPONENT

Three Span Oil & Gas, Inc. operates the Crow Flats Federal Com Well No. 1, drilled vertically from a location 1980' FSL and 1980' FWL of the same Section 30 and currently producing from the Wolfcamp formation. This pre-existing well and 40-acre unit are located within the special project area proposed by Applicant (NE/4 SW/4).

This case is related to Case No. 14277 previously heard by the Division, and to Case Nos. 14245 and 14309.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

EST. TIME

EXHIBITS

WITNESSES

OTHER PARTY

WITNESSES

EST. TIME

EXHIBITS

Jan Spradlin, Landman

20 minutes

Approx. 6

PROCEDURAL MATTERS

None at this time.

MONTGOMERY & ANDREWS, P.A.

By: J. Scott Hall
J. Scott Hall, Esq.
Post Office Box 2307
Santa Fe, New Mexico 87504
(505) 982-3873
Attorneys for COG Operating LLC

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