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2010 MAY 11 P 3:48

May 11, 2010

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

**Re: In the Matter of the Applications (4) of COG Operating, LLC for Compulsory Pooling, Lea County, New Mexico, NMOCD Case Nos. \_\_\_\_\_ (Taylor D Wells No. 2, 3, 4 and 5)**

Dear Ms. Davidson:

Attached for filing is an original and one copy each of four Applications in the above-referenced matters. I have included an advertisement for each of the four applications.

Please set these matters for hearing on June 10, 2010. Thank you.

Very truly yours,

*Karen Williams*

Karen Williams  
Assistant to J. Scott Hall

:kw  
Enclosures

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

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IN THE MATTER OF THE  
APPLICATION OF COG OPERATING LLC  
FOR COMPULSORY POOLING  
LEA COUNTY, NEW MEXICO

CASE NO. 14490

**APPLICATION**

COG Operating LLC by its undersigned attorneys, Montgomery & Andrews, P.A. (J. Scott Hall) hereby makes application pursuant to NMSA 1978 Section 70-2-17 (1995) for an order pooling all interests in all formations developed on a 40-acre basis below the base of the Unitized Formation of the Maljamar Grayburg Unit to the top of the Abo formation, including the Blinebry and Paddock members of the Yeso formation, West Maljamar Yeso Pool (44500) underlying the NW/4 SE/4 of Section 9, Township 17 South, Range 32 East, NMPM, Lea County, New Mexico, to form a standard 40-acre spacing and proration unit. Applicant would show the Division:

1. Applicant owns certain working interests in and under the NW/4 SE/4 of Section 9, and has the right to drill thereon.
2. Applicant proposes to dedicate the above-referenced pooled unit to its Taylor D Well No. 2 to be drilled from a standard location 1650' from the South line and 1650' from the East line to a depth sufficient to test the Blinebry and Paddock members of the Yeso formation underlying the NW/4 SE/4 of Section 9, Township 17 South, Range 32 East, NMPM, Lea County, New Mexico.

3. Applicant has been unable to obtain leases or voluntary agreement for pooling or farmout from certain other interest owners in the above-referenced formations underlying the NW/4 SE/4 of said Section 9.

4. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled and Applicant should be designated operator of the well.

5. The pooling of interests will afford the Applicant the opportunity to produce its just and equitable share of hydrocarbons underlying the spacing unit, will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

WHEREFORE Applicant requests that this Application be set for hearing before a duly appointed examiner of the Oil Conservation Division on June 10, 2010 and that after notice and hearing as required by law, the Division enter its Order pooling the lands and designating Applicant as operator of the well, including provisions for Applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges and providing for adjustments to such rates in accordance with accepted COPAS accounting procedures, and imposing a 200% risk factor for the risk assumed by the Applicant in drilling, completing and equipping the well, and making such other and further provisions as may be proper in the premises.

MONTGOMERY & ANDREWS, P.A.

By: 

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