



**MONTGOMERY  
& ANDREWS**

**J. SCOTT HALL**

Cell: (505) 670-7362

Email: shall@montand.com

Reply To: Santa Fe Office

www.montand.com

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March 25, 2010

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

**HAND DELIVERED**

**Re: In the Matter of the Hearing Called by the Oil Conservation Division for the Purpose of Considering the Application of COG Operating LLC to Conduct Injection Operations for Evaluation for Secondary Recovery Operations, Eddy County, New Mexico, NMOCD Case No. 14457**

Dear Ms. Davidson:

Enclosed for filing in the above-mentioned case is an original Pre-Hearing Statement and one copy.

Thank you.

Very truly yours,

Karen Williams  
Assistant to J. Scott Hall

:kw

Enclosures  
00174405

**REPLY TO:**

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

Post Office Box 2307  
Santa Fe, New Mexico 87504-2307

6301 Indian School Road NE, Suite 400  
Albuquerque, New Mexico 87110  
Telephone (505) 884-4200 • Fax (505) 888-8929

Post Office Box 36210  
Albuquerque, New Mexico 87176-6210

**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 AUTHORIZATION TO  
CONDUCT INJECTION OPERATIONS FOR  
EVALUATION FOR SECONDARY RECOVERY  
OPERATIONS, EDDY COUNTY, NEW MEXICO**

**CASE NO. 14457**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

APPLICANT

COG Operating LLC  
550 W. Texas Ave.  
Suite 1300  
Midland, TX 79701

APPLICANT'S ATTORNEY

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

OPPONENT

Lime Rock Resources

OPPONENT'S ATTORNEY

James Bruce  
P. O. Box 1056  
Santa Fe, NM 87504

**STATEMENT OF THE CASE**

APPLICANT

Applicant seeks an order authorizing the injection of water into the Paddock and Blinebry members of the Glorieta-Yeso formation, Loco Hills Glorieta-Yeso Pool (96718) in Eddy County, New Mexico. Applicant is the operator of the following well:

Texaco BE State No. 8  
API No. 30-015-35253  
330' FNL & 2310' FEL (Unit B)  
Section 16  
T-17-S, R-30-E, NMPM  
Eddy County, New Mexico

The Texaco BE State No. 8 well is drilled to a plugged-back total depth of 6013' and was originally operated as a producing oil well. COG proposes to convert and utilize the well for injection of water through a closed system into the Paddock and Blinebry formations, Loco Hills Glorieta-Yeso Pool, through perforations within the depths of 4,367' to 4,681' (Paddock) and 4,922' to 5,721' (Blinebry). Data from injection will be utilized to evaluate the feasibility of secondary recovery operations in the referenced formations.

Injection operations through the well will be conducted at an anticipated average daily injection pressure of 2,000 psi with a maximum surface injection pressure of 2,000 psi or as permitted by the Division, in excess of a 0.2 psi/ft. gradient. Applicant proposes injection of water at average daily rates of approximately 1,000 bbls and at maximum daily rates of approximately 2,000 bbls. The source of the injected fluids will be formation water from production wells that have been drilled and are scheduled to be drilled in the area.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Richard Prentice, Petroleum Engineer	1 hour	(C-108's and supporting materials)
Ramon Reyes, Geologist	15 minutes	3

OPPONENT

EST. TIME                      EXHIBITS

**PROCEDURAL MATTERS**

Applicant may request that cases 14,455, 14,456 and 14,457 be consolidated for hearing.

MONTGOMERY & ANDREWS, P.A.

By:



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J. Scott Hall, Esq.

Post Office Box 2307  
Santa Fe, New Mexico 87504  
(505) 982-3873  
Attorneys for COG Operating, LLC

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was delivered to  
counsel of record on the 24<sup>th</sup> day of March, 2010, via electronic mail.

James Bruce  
P. O. Box 1056  
Santa Fe, NM 87504



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J. Scott Hall

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