

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

**APPLICATION OF COG OPERATING LLC,
TO MAKE PERMANENT THE SPECIAL RULES
ADOPTED UNDER ORDER R-13523 FOR THE
DODD GLORIETA UPPER YESO POOL AND
THE BURCH KEELY GLORIETA UPPER
YESO POOL, EDDY COUNTY, NEW MEXICO.**

**CASE NOS. 14669, 14670, 14758,
and 14759 (Reopened)**

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by COG Operating LLC ("COG"), as required by NMAC 19.15.4.13.B.

APPEARANCES

APPLICANT

COG Operating LLC
One Concho Center
600 W. Illinois Avenue
Midland, Texas 79701

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Gabrielle A. Gerholt
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
gagerholt@hollandhart.com

STATEMENT OF THE CASE

COG Operating LLC, ("COG") seeks an order from the Oil Conservation Division making permanent the Special Rules adopted by the Division under Order No. R-13523 for the Dodd Glorieta Upper Yeso Pool (Pool Code 97917) and the Burch Keely Glorieta Upper Yeso Pool (Pool Code 97918).

In Order No. R-13523, Special Rules for the Dodd-Glorieta-Upper Yeso Pool and for the Burch Keely-Glorieta-Upper Yeso Pool were established allowing for a depth bracket allowable of 300 stock tank barrels of oil per day and a limiting gas-oil ratio of 3000 standard cubic feet of gas per barrel of oil. Additionally, the Special Rules limit the number of vertical wells which may simultaneously produce from the Blinbry formation to four (4) and from the Paddock formation to seven (7). Under the terms of Order No. R-13523, the Special Rules will expire if not made permanent by the Division.

APPLICANT'S PROPOSED EVIDENCE

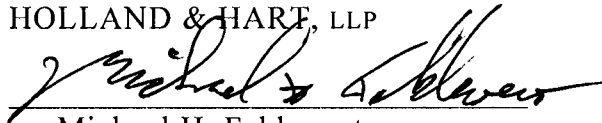
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Dylan Park, Landman	Approx. 15 minutes	Approx. 4
Cody Bacon, Geologist	Approx. 15 minutes	Approx. 4
Chris Bezner, Engineer	Approx. 30 minutes	Approx. 5

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP



Michael H. Feldewert
Adam G. Rankin
Gabrielle A. Gerholt
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

ATTORNEYS FOR COG OPERATING LLC