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

APPLICATION OF COG OPERATING LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 15293 & 15294

COG's PRE-HEARING STATEMENT

COG Operating LLC, the applicant in the above referenced matters, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

<u>APPLICANT</u>	ATTORNEY	2115	出
COG Operating LLC 550 W. Texas Avenue, Suite 100 Midland, Texas 79701	Michael H. Feldewert, Esq. Jordan L. Kessler, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile	APR 23 P 4: 05	CEWED OOD

APPLICANT'S STATEMENT OF CASE

In these two cases, COG Operating LLC seeks an order (1) creating two 160-acre spacing and proration units comprised of the E/2 W/2 and the W/2 E/2 of Section 11, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all mineral interests in the Bone Spring formation, Red Hills; Bone Spring North Pool (96434), underlying this acreage. The E/2 W/2 non-standard spacing and proration unit will be the project area for the proposed **Van Gogh Fee No. 1H Well,** which will be horizontally drilled from a surface location in the

SE/4 SW/4 (Unit N) to a standard bottom hole location in the NE/4 NW/4 (Unit C) of Section 11. The W/2 E/2 non-standard spacing and proration unit will be the project area for the proposed **Van Gogh Fee No. 2H Well,** which will be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) to a standard bottom hole location in the NW/4 NE/4 (Unit B) of Section 11. The completed interval for each of these wells will comply with the Division's setback requirements.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS	
Mike Wallace – Landman	Approx. 10	Approx. 7	
Henry Zollinger – Geologist	Approx. 10	Approx. 4	

PROCEDURAL MATTERS

COG requests that Cases 15293 and 15294 be consolidated for hearing.

Respectfully submitted,

HOLLAND & HART, LLP

Michael H. Feldewert Jordan L. Kessler

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

ilkessler@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC.