

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

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

**CASE NOS. 15311, 15312 & 15313**

**COG's ENTRY OF APPEARANCE AND PRE-HEARING STATEMENT**

Counsel for COG Operating LLC, Ocean Munds-Dry, enters an appearance in the above referenced matters, and submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

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

**ATTORNEY**

Ocean Munds-Dry, Esq.  
1048 Paseo de Peralta  
Santa Fe, New Mexico 87501  
(505) 780-8000  
(505) 428-0485 Facsimile

**OTHER PARTY**

Chevron U.S.A. Inc.

Benjamin L. Bosell, Esq.  
1400 Smith Street  
Houston, Texas 77002  
(713) 372-7966

**APPLICANT'S STATEMENT OF CASE**

In these three cases, COG Operating LLC seeks an order (1) creating three 320-acre spacing and proration units comprised of the E/2 W/2, W/2 E/2, and the W/2 W/2 of Sections 5 and 8, Township 26 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all mineral interests in the Bone Spring formation, WC-025 G-06 S263407P; Upr Bone Spring Pool (97892) underlying this acreage. The E/2 W/2 non-standard spacing and proration unit will

be the project area for the proposed **Gunner 8 Fed Com No. 6H Well**, which will be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 8 to a standard bottom hole location in NE/4 NW/4 (Unit C) of Section 5. The W/2 E/2 non-standard spacing and proration unit will be the project area for the proposed **Gunner 8 Fed Com No. 7H Well**, which will be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 8 to a standard bottom hole location in NW/4 NE/4 (Unit B) of Section 5. The W/2 W/2 non-standard spacing and proration unit will be the project area for the proposed **Gunner 8 Fed Com No. 9H Well**, which will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 8 to a standard bottom hole location in NW/4 NW/4 (Unit D) of Section 5. The completed interval for each of these wells will comply with the Division's setback requirements.

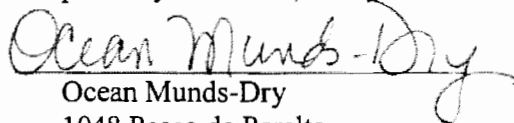
**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Ryan Owens – Landman	Approx. 15	Approx. 7
Henry Zollinger – Geologist	Approx. 10	Approx. 4

**PROCEDURAL MATTERS**

COG requests that Cases 15311, 15312 and 15313 be consolidated for hearing.

Respectfully submitted,



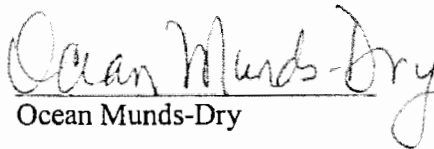
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**ATTORNEYS FOR COG OPERATING LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this Entry of Appearance and Pre-Hearing Statement was served upon the following counsel of record this 21st day of May, 2015 by e-mail:

Benjamin L. Bosell  
1400 Smith Street  
Houston, Texas 77002  
(713) 372 - 7966  
Ben.bosell@chevron.com

  
Ocean Munds-Dry