

4/20/2015 10:20 AM

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

**APPLICATION OF ROVER OPERATING,
LLC FOR STATUTORY UNITIZATION,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16354

**APPLICATION OF ROVER OPERATING,
LLC FOR APPROVAL OF A SECONDARY
RECOVERY PROJECT, EDDY COUNTY,
NEW MEXICO.**

CASE NO. 16355

COG's PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Rover Operating, LLC

ATTORNEY

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OPPONENT

COG Operating LLC
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ATTORNEY

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APPLICANT'S STATEMENT OF CASE

Rover Operating, LLC ("Rover") seeks an order statutorily unitizing mineral interest owners for the purpose of instituting a secondary recovery project. Rover seeks to unitize 639.60 acres comprised of Section 2, Township 17 South, Range 31 East, NMPM, Eddy County, New Mexico, from the top of the Loco Hills Sand to the base of the Lovington Sand.

OPPONENT'S STATEMENT OF CASE

COG owns mineral rights in said Section 2 directly below the proposed unitized formation. COG objects to the proposed secondary recovery project due to 1) pressure issues associated with drilling through the injection interval; and 2) the impact of injection on older existing wells in the area.

OPPONENT'S PROPOSED EVIDENCE

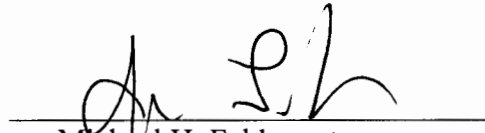
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Stuart Dirks – Landman	Approx. 15	Approx. 4
Harvin Broughton – Geologist	Approx. 15	Approx. 5
Jayne Junell – Reservoir Engineer	Approx. 15	Approx. 5
Ryan Murphy – Production Engineer	Approx. 15	Approx. 5
Parker Simmons – Drilling Engineer	Approx. 15	Approx. 5

PROCEDURAL MATTERS

COG has been informed that these cases will be continued to a future docket.

Respectfully submitted,

HOLLAND & HART LLP



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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce

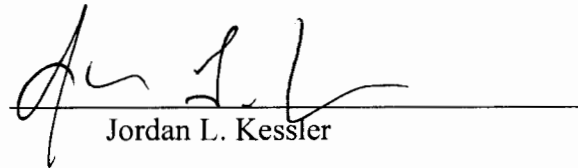
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