

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

**APPLICATION OF COG OPERATING LLC  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 20927**

**PRE-HEARING STATEMENT OF COG OPERATING LLC**

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

**APPEARANCES OF THE PARTIES**

**APPLICANT**

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

**ATTORNEY**

Ocean Munds-Dry  
William F. Carr  
Elizabeth A. Ryan  
Michael Rodriguez  
1048 Paseo de Peralta  
Santa Fe, New Mexico 87501  
(505)780-8000  
omundsdry@concho.com  
wcarr@concho.com  
eryan@concho.com  
mrodriguez@concho.com

**OPPOSING PARTY**

EOG Resources, Inc  
5509 Champions Drive  
Midland, Texas 79706

**OPPOSING PARTY'S ATTORNEYS**

Earl E. DeBrine, Jr.  
Deana M. Bennett  
Lance D. Hough  
Post Office Box 2168  
500 Fourth Street, NW, Suite 2168  
Albuquerque, New Mexico 87103  
(505) 848-1800  
edebrine@modrall.com  
dmb@modrall.com  
ldh@modrall.com

### **STATEMENT OF THE CASE**

Applicant in the above styled cause seeks an order (1) creating a standard 1280-acre, more or less, horizontal spacing unit comprised of all of Sections 3 and 10, in Township 26 South, Range 29 East, NMPM, Eddy County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp Formation, Purple Sage; Wolfcamp Pool (Pool code: 98220). Said spacing unit shall be dedicated to the:

- **Rock Jelly Fed Com 701H** well which will be horizontally drilled from a surface location in the NE/4NE/4 (Unit A) of Section 3 to a bottom hole location in the SE/4SE/4 (Unit P) of Section 10,
- **Rock Jelly Fed Com 702H** well which will be horizontally drilled from a surface location in the NE/4NE/4 (Unit A) of Section 3 to a bottom hole location in the SW/4SE/4 (Unit O) of Section 10,
- **Rock Jelly Fed Com 703H** well which will be horizontally drilled from a surface location in the NE/4NW/4 (Unit O) of Section 3 to a bottom hole location in the SE/4SW/4 (Unit N) of Section 10,
- **Rock Jelly Fed Com 704H** well which will be horizontally drilled from a surface location in the NE/4NW/4 (Unit C) of Section 3 to a bottom hole location in the SE/4SW/4 (Unit N) of Section 10, and
- **Rock Jelly Fed Com 705H** well which will be horizontally drilled from a surface location in the NE/4NW/4 (Unit C) of Section 3 to a bottom hole location in the SW/4SW/4 (Unit M) of Section 10,

The completed interval for the proposed **Rock Jelly Fed Com 703H** will be within 330' of the line separating the W/2 E/2 and the E/2 W/2 of Sections 3 and 10, which allows inclusion of this acreage

in a standard 1280-acre, more or less, horizontal spacing unit. The completed interval for all other proposed wells will comply with the setback requirements of the Division's Special Pool Rules for the Purple Sage; Wolfcamp Pool.

Also to be considered will be the timing of the drilling and completing of said wells, the allocation of the costs thereof, the actual operating cost and charges for supervision, the designation of COG Operating LLC as operator of the wells, and the imposition of a 200% charge for risk involved in drilling and completing said wells. Said area is located approximately 12 miles southeast of Malaga, Eddy County, New Mexico.

#### **PROPOSED EVIDENCE**

##### **WITNESSES:**

Ashley Roush, Landmen  
Dean Snidow, Geologist

##### **ESTIMATED TIME:**

Via Affidavit  
Via Affidavit

##### **EXHIBITS:**

Approx. 3  
Approx. 3

#### **PROCEDURAL MATTERS**

There are no procedural matters to be addressed at this time.

Respectfully submitted,  
COG OPERATING LLC

By: 

Ocean Munds-Dry  
William F. Carr  
Elizabeth A. Ryan  
Michael Rodriguez  
1048 Paseo de Peralta  
Santa Fe, New Mexico 87501  
(505)780-8000  
omundsdry@concho.com  
wcarr@concho.com  
eryan@concho.com  
rodriguez@concho.com

**ATTORNEYS FOR COG OPERATING LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2020, I filed with the Division clerk the foregoing document and served a copy of the foregoing document to the following counsel of record via Electronic Mail:

Earl E. DeBrine, Jr. – edbrine@modrall.com  
Deana M. Bennett – dmb@modrall.com  
Lance D. Hough – ldh@modrall.com



Ocean Munds-Dry  
William F. Carr  
Elizabeth A. Ryan  
Michael Rodriguez