

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

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

**CASE NOS. 21264-21265**

**COG'S CONSOLIDATED PRE-HEARING STATEMENT**

COG Operating LLC ("COG") (OGRID No. 229137), the applicant in the above-referenced cases, 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**

Michael H. Feldewert, Esq.  
Adam G. Rankin, Esq.  
Julia Broggi, Esq.  
Kaitlyn A. Luck, Esq.  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421

**APPLICANT'S STATEMENT OF CASE**

In these consolidated cases, COG seeks orders pooling all uncommitted interests in the Bone Spring and Wolfcamp formations underlying two standard 480-acre, more or less, horizontal spacing units comprised of the E/2 of Section 20, and the NE/4 of Section 29, Township 25 South, Range 35 East, Lea County, New Mexico.

Under **Case 21264**, COG seeks to pool the Bone Spring formation [WC-025 G-08 S2535340;BONE SPRING Pool (97088)] and initially dedicate the spacing unit to the following proposed initial wells:

- The **Green Beret Federal Com #501H** and **Green Beret Federal Com #602H** to be drilled from a common surface hole location in the NW/4 NE/4 (Unit B) of Section 20 to bottom hole locations in the SW/4 NE/4 (Unit G) of Section 29; and
- The **Green Beret Federal Com #601H** to be drilled from a surface hole location in NE/4 NE/4 (Unit A) of Section 20 to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 29.

The completed interval for the proposed Green Beret Federal Com #602H well will remain within 330 feet of the E/2 E/2 of Section 20, and the E/2 NE/4 of Section 29, to allow inclusion of these proximity tracts in a standard 480-acre horizontal well spacing unit.

Under **Case 21265**, COG seeks to pool the Wolfcamp formation [DOGIE DRAW;WOLFCAMP Pool (17980)] and initially dedicate the spacing unit to the following proposed initial wells:

- The **Green Beret Federal Com #701H** to be drilled from a surface hole location in NE/4 NE/4 (Unit A) of Section 20 to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 29; and
- The **Green Beret Federal Com #702H** and **Green Beret Federal Com #801H** to be drilled from a common surface hole location in the NW/4 NE/4 (Unit B) of Section 20 to bottom hole locations in the SW/4 NE/4 (Unit G) of Section 29.

The completed interval for the proposed Green Beret Federal Com #701H well will remain within 330 feet of the W/2 E/2 of Section 20 and the W/2 NE/4 of Section 29 to allow inclusion of these proximity tracts in a standard 480-acre horizontal well spacing unit.

**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Megan Tipton, Landman	Affidavit	Approx. 8
Brian Sitek, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

COG asks that these cases be consolidated for hearing. COG does not anticipate opposition to these pooling applications and therefore intends to present these consolidated cases by affidavits.

Respectfully submitted,

HOLLAND & HART LLP



---

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
kaluck@hollandhart.com

**ATTORNEYS FOR COG OPERATING LLC**