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 NOS. 21292-21293

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 (505) 983-6043 Facsimile

OTHER PARTIES

Mewbourne Oil Company 3620 Old Bullard Road Tyler, TX 75701 James Bruce, Esq. Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, COG seeks orders pooling all uncommitted interests in the

Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool [98220]) underlying two standard 960-

acre, more or less, horizontal spacing units comprised of the E/2 and the W/2 of Sections 5, 8, and 17, Township 25 South, Range 28 East, Eddy County, New Mexico.

Under <u>Case 21292</u>, COG seeks to form and initially dedicate the E/2 spacing unit to the following proposed initial wells:

- The Long Jon State Com 601H well 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 NE/4 NE/4 (Unit A) of Section 5; and
- The Long Jon State Com 602H and Long Jon State Com 603H wells to be drilled from a common c hole location in the NW/4 NE/4 (Unit B) of Section 20 to bottom hole locations in the NW/4 NE/4 (Unit B) of Section 5.

Under <u>Case 21293</u>, COG seeks to form and initially dedicate the W/2 spacing unit to the following proposed initial wells:

- The Long Jon State Com 604H and Long Jon State Com 605H wells to be drilled from a surface hole location in NE/4 NW/4 (Unit C) of Section 20 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 5; and
- The Long Jon State Com 606H well to be drilled from a common surface hole location in the NW/4 NW/4 (Unit D) of Section 20 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 5.

The completed intervals of these wells will comply with the requirements of the Special Rules for the Purple Sage Wolfcamp Gas Pool.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Travis Macha, Landman	Affidavit	Approx. 8
Travis Sparks, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

COG asks that these matters be consolidated for hearing. Mewbourne has filed a prehearing statement objecting to the presentation of these matters by affidavits. COG will therefore undertake efforts to have these matters scheduled for a contested hearing.

Respectfully submitted,

HOLLAND & HART LLP

File

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 agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com

ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 04, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 505-982-2043 *jamesbruc@aol.com*

Attorney for Mewbourne Oil Company

Michael H. Feldewert