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

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

Case Nos. 21219-21220

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:

ATTORNEYS:

COG Operating LLC One Concho Center 600 W. Illinois Avenue Midland, Texas 79701 Ocean Munds-Dry
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OPPOSING PARTY:

ATTORNEYS:

Mewbourne Oil Co. PO Box 5270 Hobbs, NM 88241 James Bruce PO Box 1056 Santa Fe, NM 87504 505-982-2043 jamesbruc@aol.com

STATEMENT OF THE CASE

In Case No. 21219, COG Operating LLC seeks an order pooling all uncommitted interest owners in the Wolfcamp formation, Purple Sage-Wolfcamp Gas Pool (Pool code 98220), underlying a standard 960.48-acre, more or less, horizontal spacing unit comprised of Lots 1, 2, S/2NE/4, SE/4 of Section 6, E/2 of Section 7, and E/2 of Section 18, Township 25 South, Range 28 East, NMPM, Eddy County, New. COG Operating LLC seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The Scout State Com 601H well to be horizontally drilled from a surface hole location
 in Lot 1 (Unit A) of Section 6 to a bottom hole location in the SE/4SE/4 (Unit P) of
 Section 18,
- The Scout State Com 602H well to be horizontally drilled from a surface hole location in Lot 1 (Unit A) of Section 6 to a bottom hole location in the SW/4SE/4 (Unit O) of Section 18, and
- The Scout State Com 603H well to be horizontally drilled from a surface hole location in Lot 2 (Unit B) of Section 6 to a bottom hole location in the SW/4SE/4 (Unit O) of Section 18.

Also, to be considered will be the allocation of the cost thereof, the actual operating costs and charges for supervision, the designation of COG Operating LLC as operator of the wells, and the imposition of 200% charge for risk involved in drilling and completing said wells. Said area is located approximately 5.4 miles southwest of Malaga, New Mexico

In Case No. 21220, COG Operating LLC seeks an order pooling all uncommitted interest owners in the Wolfcamp formation, Purple Sage-Wolfcamp Gas Pool (Pool code 98220), underlying a standard 966.73-acre, more or less, horizontal spacing unit comprised of Lots 3-7,

SE/4NW/4, E/2SW/4 of Section 6, Lots 1-4 and E/2W/2 of Section 7, and Lots 1-4 and E/2W/2 of Section 18, Township 25 South, Range 28 East, NMPM, Eddy County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The Scout State Com 604H well to be horizontally drilled from a surface hole location in Lot 3 (Unit C) of Section 6 to a bottom hole location in the SE/4SW/4 (Unit N) of Section 18,
- The Scout State Com 605H well to be horizontally drilled from a surface hole location
 in Lot 4 (Unit D) of Section 6 to a bottom hole location in Lot 4 (Unit M) of Section
 18, and
- The Scout State Com 606H well to be horizontally drilled from a surface hole location in Lot 4 (Unit D) of Section 6 to a bottom hole location in Lot 4 (Unit M) of Section 18.

Also, to be considered will be the cost of drilling and completing the wells, the allocation of the cost thereof, the actual operating costs and charges for supervision, the designation of applicant as operator, and the imposition of 200% charge for risk involved in drilling and completing each well. Said area is located approximately 5.4 miles southwest of Malaga, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Qualifications	Estimated	Exhibits
			Time	
Travis Macha	Petroleum Landman	See direct testimony	N/A	Approx. 4
Dean Snidow	Petroleum Engineer	See direct testimony	N/A	Approx. 4
David Hurd	Reservoir Engineer	See direct testimony	N/A	Approx. 5
Parker Simmons	Drilling Engineer	See direct testimony	N/A	Approx. 10
Craig Rohwer	Completions Engineer	See direct testimony	N/A	Approx. 10

PROCEDURAL MATTERS

COG Operating LLC requests case numbers 20219 and 20220 be consolidated at hearing.

Respectfully submitted,

COG OPERATING LLC

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ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 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:

James Bruce PO Box 1056 Santa Fe, NM 87504 505-982-2043 jamesbruc@aol.com

> Ocean Munds-Dry Michael Rodriguez