

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

**APPLICATION OF COLGATE OPERATING, LLC
FOR COMPULSORY POOLING, AND NON-
STANDARD SPACING AND PRORATION UNIT IN
EDDY COUNTY, NEW MEXICO**

CASE NO. 21303

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by COLGATE OPERATING, LLC, by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:	Colgate Operating, LLC
ATTORNEY:	Ernest L. Padilla Padilla Law Firm, P.A. P.O. Box 2523 Santa Fe, New Mexico 87504 (505) 988-7577 padillalaw@qwestoffice.net
OPPOSITION OR OTHER PARTY:	COG Operating LLC
ATTORNEY:	Ocean Munds-Dry Michael Rodriguez 1048 Paseo de Peralta Santa Fe, NM 87501 (505) 780-8000 omundsdry@concho.com mrodriguez@concho.com

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order proposing order pooling all mineral interests within the Bone Spring Formation, underlying the S/2 of Section 22, Township 19 South, Range 28 East, NMPM and Section 28, Township 19 South, Range 28 East, NMPM, Eddy County, New Mexico. Applicant seeks to dedicate the above referenced horizontal spacing unit to the following four initial wells:

- A. **Rincon 22 State 123H**
 SHL: 1380 feet from the South line and 263 feet from the West line, (Unit L) of Section 22, Township 19 South, Range 28 East, NMPM.
 BHL: 1613 feet from the South line and 100 feet from the East line, (Unit I) of Section 22, Township 19 South, Range 28 East, NMPM.
 Completion Target: 2nd Bone Spring Sand at approx 7400 feet TVD.
 Well Orientation: West to East
 Completion Location expected to be: standard
 Spacing Unit: N/2 S/2 of Section 22;
- B. **Rincon 22 State 133H**
 SHL: 1335 feet from the South line and 263 feet from the West line, (Unit L) of Section 22, Township 19 South, Range 28 East, NMPM.
 BHL: 1713 feet from the South line and 100 feet from the East line, (Unit I) of Section 22, Township 19 South, Range 28 East, NMPM.
 Completion Target: 3rd Bone Spring Sand at approx 8700 feet TVD.
 Well Orientation: West to East
 Completion Location expected to be: standard
 Spacing Unit: N/2 S/2 of Section 22;
- C. **Rincon 22 State 124H**
 SHL: 1290 feet from the South line and 263 feet from the West line, (Unit M) of Section 22, Township 19 South, Range 28 East, NMPM.
 BHL: 330 feet from the South line and 100 feet from the East line, (Unit P) of Section 22, Township 19 South, Range 28 East, NMPM.
 Completion Target: 2nd Bone Spring Sand at approx 7500 feet TVD.
 Well Orientation: West to East
 Completion Location expected to be: standard
 Spacing Unit: S/2 S/2 of Section 22;
- D. **Rincon 22 State 134H**
 SHL: 1245 feet from the South line and 263 feet from the West line, (Unit M) of Section 22, Township 19 South, Range 28 East, NMPM.
 BHL: 430 feet from the South line and 100 feet from the East line, (Unit P) of Section 22, Township 19 South, Range 28 East, NMPM.
 Completion Target: 3rd Bone Spring Sand at approx 8700 feet TVD.
 Well Orientation: West to East
 Completion Location expected to be: standard
 Spacing Unit: S/2 S/2 of Section 22.

These wells are located approximately 13 miles SW of Loco Hills, New Mexico.

OPPOSITION OR OTHER PARTY:

PROPOSED EVIDENCE

APPLICANT

WITNESSES		EST. TIME	EXHIBITS
Name	Title	Est. time	Exhibits
Mark Hajdik	Landman	15 minutes	Approximately 6
Sergio Ojeda	Geologist	15 minutes	Approximately 10

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

None.

PADILLA LAW FIRM, P.A.

/s/ Ernest L. Padilla

Ernest L. Padilla

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CERTIFICATE OF SERVICE

I certify that on July 16, 2020, I served a copy of the foregoing pleading by electronic mail to:

Ocean Munds-Dry
Michael Rodriguez

omundsdry@concho.com
mrodriguez@concho.com

/s/ Ernest L. Padilla