

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

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

**CASE NO. 21420**

**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

**ATTORNEYS:**

Ocean Munds-Dry  
Michael Rodriguez  
1048 Paseo de Peralta  
Santa Fe, New Mexico 87501  
(505) 780-8000  
omundsdry@concho.com  
mrodriguez@concho.com

**INTERESTED PARTY:**

EOG Resources, Inc.

**ATTORNEYS:**

Earl E. DeBrine, Jr.  
Deana M. Bennett  
Lance D. Hough  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
(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 pooling all uncommitted interest owners in the Bone Spring formation [Triste Draw; Bone Spring (96603)] underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 26 and 35, Township 23 South, Range 32 East, Lea County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the to the following proposed wells:

- Bedlington Federal Com #201H to be drilled from a surface hole location in SE/4SW/4 (Unit N) of Section 35 to a bottom hole location in the NW/4NW/4 (Unit D) of Section 26;
- Bedlington Federal Com #202H to be drilled from a surface hole location in SE/4SW/4 (Unit N) of Section 35 to a bottom hole location in the NE/4NW/4 (Unit C) of Section 26;
- Bedlington Federal Com #301H to be drilled from a surface hole location in SE/4SW/4 (Unit N) of Section 35 to a bottom hole location in the NW/4NW/4 (Unit D) of Section 26;
- Bedlington Federal Com #302H to be drilled from a surface hole location in SE/4SW/4 (Unit N) of Section 35 to a bottom hole location in the NW/4NW/4 (Unit D) of Section 26;
- Bedlington Federal Com #303H to be drilled from a surface hole location in SE/4SW/4 (Unit N) of Section 35 to a bottom hole location in the NE/4NW/4 (Unit C) of Section 26;
- Bedlington Federal Com #501H to be drilled from a surface hole location in SE/4SW/4 (Unit N) of Section 35 to a bottom hole location in the NW/4NW/4 (Unit D) of Section 26;
- Bedlington Federal Com #502H to be drilled from a surface hole location in SE/4SW/4 (Unit N) of Section 35 to a bottom hole location in the NW/4NW/4 (Unit D) of Section 26;
- Bedlington Federal Com #503H to be drilled from a surface hole location in SE/4SW/4 (Unit N) of Section 35 to a bottom hole location in the NE/4NW/4 (Unit C) of Section 26.

The completed interval for the proposed Bedlington Federal Com #302H well will be within 330' of the quarter-quarter line separating the W/2W/2 and the E/2W/2 of Sections 26 and 35 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit.

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 25 miles east of Malaga, New Mexico.

**PROPOSED EVIDENCE**

<b>WITNESS</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Adam Reker, Landman	Via Affidavit	Approx. 3
John Bertalott, Geologist	Via Affidavit	Approx. 4

**PROCEDURAL MATTERS**

COG Operating LLC intends to present this case by affidavit. COG requests that this case be consolidated with Case No. 21421

Respectfully submitted,

COG OPERATING LLC

*/s/ Michael Rodriguez*

---

Ocean Munds-Dry  
Michael Rodriguez  
COG Operating LLC  
1048 Paseo de Peralta  
Santa Fe, New Mexico 87501  
(505) 780-8000  
omundsdry@concho.com  
mrodriguez@concho.com

**ATTORNEYS FOR COG OPERATING LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 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.  
Deana M. Bennett  
Lance D. Hough  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800  
*edebrine@modrall.com*  
*dmb@modrall.com*  
*ldh@modrall.com*

*/s/ Michael Rodriguez*

---

Ocean Munds-Dry  
Michael Rodriguez