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

APPLICATION OF COG OPERATING LLC TO AMEND ORDER NO. R-21414, EDDY COUNTY, NEW MEXICO.

**CASE NO. 21922** 

APPLICATION OF COG OPERATING LLC TO AMEND ORDER NO. R-21415, EDDY COUNTY, NEW MEXICO.

**CASE NO. 21923** 

#### 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**

#### **ATTORNEY**

COG Operating LLC One Concho Center 600 W. Illinois Avenue Midland, Texas 79701 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 **Case No. 21922**, COG seeks to amend Order No. R-21414 ("Order") to allow for an extension of time for drilling the proposed initial well under the Order. Division Order No. R-21414, entered on July 29, 2020, in Case No. 21322, created a standard 320-acre standard horizontal spacing unit comprised of the S/2 S/2 of Sections 20 and 21, Township 19 South, Range

28 East, NMPM, Eddy County, New Mexico ("Unit"), and designated COG as operator of the Unit. The Order further pooled the uncommitted interests in the Bone Spring formation [Winchester; Bone Spring West Pool (97569)] in the Unit, and dedicated the Unit to the proposed initial **Bigfoot State Com #501H well** (API No. 30-015-48101), and the **Bigfoot State Com #601H well** (API No. 30-015-47132). COG requests that Order No. R-21414 be re-opened and amended to extend the deadline to commence drilling the well be extended for a year, to July 29, 2022.

In Case No. 21923, COG seeks to amend Order No. R-21415 ("Order") to allow for an extension of time for drilling the proposed initial well under the Order. Division Order No. R-21415, entered on July 29, 2020, in Case No. 21323, created a standard 320-acre standard horizontal spacing unit comprised of the N/2 S/2 of Sections 20 and 21, Township 19 South, Range 28 East, NMPM, Eddy County, New Mexico ("Unit"), and designated COG as operator of the Unit. The Order further pooled the uncommitted interests in the Bone Spring formation [Winchester; Bone Spring West Pool (97569)] in the Unit, and dedicated the Unit to the proposed initial Bigfoot State Com #502H well (API No. 30-015-48100), and the Bigfoot State Com #602H well (API No. 30-015-47131). COG requests that Order No. R-21415 be re-opened and amended to extend the deadline to commence drilling the well be extended for a year, to July 29, 2022.

# APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Jeff Stout, Landman	Affidavit	Approx. 5
Travis Sparks, Geologist	Affidavit	Approx. 3

## **PROCEDURAL MATTERS**

COG does not expect opposition at the hearing and therefore intends to consolidate these cases and present them by affidavit.

Respectfully submitted,

**HOLLAND & HART LLP** 

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