

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

**APPLICATION OF COG OPERATING LLC FOR CREATION OF A NON-STANDARD SPACING AND PRORATION UNIT, COMPULSORY POOLING, AND APPROVAL OF A NON-STANDARD PROJECT AREA, EDDY COUNTY, NEW MEXICO.**

**CASE 15237**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by COG Operating LLC ("COG"), as required by NMAC 19.15.4.13.B.

**APPEARANCES**

**APPLICANT**

COG Operating LLC  
One Concho Center  
600 W. Illinois Avenue  
Midland, Texas 79701

**ATTORNEY**

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**STATEMENT OF THE CASE**

COG seeks an order (1) creating a 120-acre spacing and proration unit comprised of the S/2SW/4 and the SW/4SE/4 of Section 15, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico; (2) pooling all mineral interests underlying this acreage from the top of the Yeso formation to a depth of 4,000 feet; and (3) approving a non-standard 120-acre project area. COG proposes to dedicate the above-referenced spacing and proration unit as the project area for its proposed **Pilum 15 Fee 2H Well**, which will be horizontally drilled from a surface location in the SE/4SE/4 (Unit P) of

Section 16, Township 18 South, Range 26 East to a standard bottom hole location in SW/4SE/4 (Unit O) of Section 15. The completed interval for this well will commence in SW/4SW/4 (Unit M) of Section 15 and remain within the 330-foot standard offset required by the Statewide Rules set forth in 19.15.15 NMAC.

**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Stuart Dirks, Landman	Approx. 10 minutes	Approx. 5
Greg Clark, Geologist	Approx. 10 minutes	Approx. 5

**PROCEDURAL MATTERS**

COG had applied for an order seeking to pool all mineral interests in the Yeso formation underlying the proposed non-standard spacing unit. Upon further analysis, COG has chosen to limit the request for pooling to mineral interests underlying the proposed non-standard unit from the top of the Yeso formation to a depth of 4,000 feet.

Respectfully submitted,

HOLLAND & HART, LLP



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