

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

**APPLICATION OF APACHE CORPORATION FOR APPROVAL
OF THE FIRE EAGLE STATE SAN ANDRES EXPLORATORY
UNIT, LEA COUNTY, NEW MEXICO.**

CASE NO. 15401

COG's PRE-HEARING STATEMENT

COG Operating LLC, a party affected by the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Apache Corporation
303 Veterans Airpark Lane
Suite 3000
Midland, TX 79705

ATTORNEY

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OPPONENT

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STATEMENT OF CASE

COG Operating LLC owns a working interest in the SE/4 of Section 10, Township 10 South, Range 36 East, NMPM, Lea County, New Mexico. COG will present information that will show that the unit boundary as proposed by Apache will impair the correlative rights of COG and will tend to reduce the ultimate recovery from the San Andres formation in this area. Joseph Scott (Landman) will review the status of the lands in the area of the proposed Fire Eagle Unit and the communications between COG and Apache concerning the proposed unit boundaries. Mr. Scott will review COG's objections to these boundaries and the effect of these boundaries on COG's leasehold rights in the SE/4 of Section 10 under the proposed unit agreement. Cody Bacon (Geologist) will review the geology of the San Andres formation in the subject area and compare this data to Apache's proposed unit boundary.

APPLICANT'S PROPOSED EVIDENCE

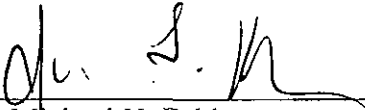
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Joseph Scott, Landman	Approx. 15	Approx. 3
Cody Bacon, Geologist	Approx. 10	Approx. 2

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP



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ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2015, I served a copy of the foregoing document to the following via electronic mail to:

Earl DeBrine, Jr., Esq.

Jennifer L. Bradfute

Modrall, Sperling, Roehl, Harris & Sisk, P.A.

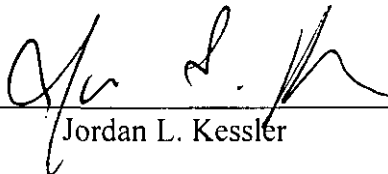
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