

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

**APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION  
THROUGH THE SUPERVISOR OF DISTRICT II FOR AN EMERGENCY ORDER  
SUSPENDING CERTAIN APPROVED APPLICATIONS FOR PERMITS TO DRILL,  
AND FOR ADOPTION OF SPECIAL RULES FOR DRILLING IN CERTAIN AREAS  
FOR THE PROTECTIONS OF FRESH WATER, CHAVES AND EDDY COUNTIES,  
NEW MEXICO.**

**CASE NO. 15487**

**COG AND OXY'S PRE-HEARING STATEMENT**

COG Operating, LLC, ("COG") and OXY USA Inc. ("OXY"), submit this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Oil Conservation Division

**ATTORNEY**

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**INTERESTED PARTY**

COG Operating LLC

**ATTORNEYS**

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**INTERESTED PARTY**

OXY USA Inc.

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**OPPONENT**

Pecos Valley Artesian Conservancy District

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**STATEMENT OF CASE**

Application seeks adoption of special pool rules in designated pools in Eddy and Chaves counties for the protection of sources of fresh water designated by the State Engineer. Within the designated area, Applicant seeks to require compliance with "minimum requirements." Applicant has not yet proposed special pool rules, therefore COG and OXY are not able to state a position on this case.

**PROPOSED EVIDENCE**

| <b>WITNESS<br/>Name and Expertise</b>        | <b>ESTIMATED TIME</b> | <b>EXHIBITS</b> |
|--|-----------------------|-----------------|
| Carl Bird<br>Petroleum Engineer, COG         | Approx. 20            | Approx. 5       |
| Harvin Broughton<br>Petroleum Geologist, COG | Approx. 20            | Approx. 5       |

Timothy Reed  
Hydrologist, COG

Approx. 20

Approx. 5

Ryan Farrell  
Drilling Engineer, OXY

Approx. 20

Approx. 5

James Reid  
Senior Drilling Engineer,  
OXY

Approx. 20

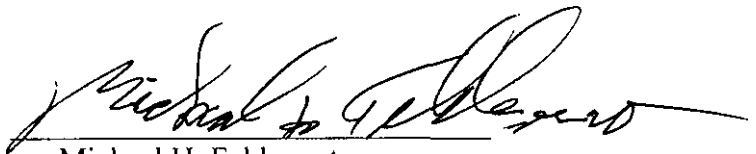
Approx. 5

**PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

HOLLAND & HART LLP



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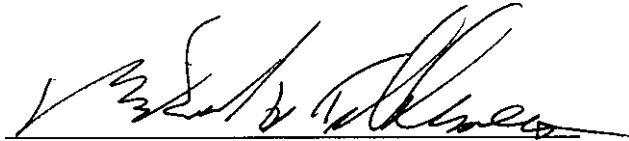
**ATTORNEYS FOR COG OPERATING LLC  
AND OXY USA INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2016, I served a copy of the foregoing document to the following counsel of record via electronic mail:

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A handwritten signature in black ink, appearing to read "Michael H. Feldewert", written over a horizontal line.

Michael H. Feldewert  
Jordan L. Kessler