



MODRALL SPERLING
LAWYERS

L 1

Jennifer L. Bradfute
505 848 1845
Fa 505 848 1882
jlb@modall.com

June 15 2017

Florene Davidson
NM Oil Conservation Division
1220 S St Francis Drive
Santa Fe NM 87505

**Re Case No 15727
APPLICATION OF COG OPERATING LLC FOR NON
STANDARD SPACING AND PRORATION UNIT AND
COMPULSORY POOLING, LEA COUNTY, NEW MEXICO**

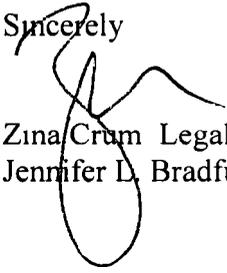
Dear Ms Davidson

Enclosed please find three copies of the following

1 Pre Hearing Statement / EOG Resources

Thank you for your assistance Please contact me if you have any
questions

Sincerely


Zina Crum Legal Assistant to
Jennifer L. Bradfute

JLB/zc
Enclosure

Mod all Spe l g
Roehl Ha s & S sk
P A

Bank of Ame ca
Ce t e
500 Fou th St eet
NW
S te 1000
Albuquerque
New Me ico 87102

PO Box 2168
Albu erque
New Me co
87103 2168

T

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

2/17/12

**APPLICATION OF COG OPERATING LLC
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

CASE NO 15727

EOG RESOURCES INC 'S PRE-HEARING STATEMENT

EOG Y Resources Inc , EOG A Resources Inc and EOG M Resources Inc
("EOG ") submit this Pre Hearing Statement for the above referenced case pursuant to the rules
of the Oil Conservation Division

APPEARANCES

APPLICANT

COG Operating LLC

ATTORNEY

William F Carr
Ocean Munds Dry
COG OPERATING LLC
1048 Paseo de Peralta
Santa Fe NM 87501
wcarr@concho.com
omundsdry@concho.com

OPPONENT/INTERVENOR

EOG Y Resources Inc
EOG A Resources Inc and
EOG M Resources Inc

Earl E DeBrine Jr Esq
Jennifer L Bradfute Esq
MODRALL SPERLING ROEHL
HARRIS & SISK P A
P O Box 2168
Albuquerque New Mexico 87103 2168
(505) 848 1800

STATEMENT OF CASE

APPLICANT

Applicant in the above styled cause seeks an order approving a non standard oil spacing and proration unit in the Bone Spring formation and pooling of all uncommitted mineral interests in the Bone Spring formation underlying the W/2 W/2 of Sections 1 and 12 both contained in Township 22 South Range 33 East NMPM Lea County New Mexico

OPPONENT

EOG opposes this application because it has numerous unresolved issues with Applicant regarding the proposed unit including notice for the application the receipt of necessary regulatory approvals completion plans and the existing/proposed governing agreements EOG owns the majority of the working interest in 80 acres contained within the proposed non standard proration unit for the well

PROPOSED EVIDENCE

OPPONENT

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Charles Moran– Landman	Approx 15	Approx 5
Lorraine Baline – Geologist	Approx 10	Approx 4
Shane Kelly – Engineer	Approx 15	Approx 4

PROCEDURAL MATTERS

EOG respectfully requests that this case be continued to the July 20th docket so that it can properly consider the well proposal completion plans and regulatory approvals for the proposed well Mr Moran is currently unavailable to appear at the scheduled June 22 hearing and is currently unable to attend the July 6 hearing Ms Baline will be out of town on July 6 and is currently unable to attend the July 6 hearing

Respectfully submitted

**MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P A**

By 
Earl E. DeBrine, Jr.
Jennifer L Bradfute
Post Office Box 2168
Bank of America Centre
500 Fourth Street NW Suite 1000
Albuquerque, New Mexico 87103 2168
Telephone 505 848 1800

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on June 15 2017

William F Carr
Ocean Munds Dry
COG OPERATING LLC
1048 Paseo de Peralta
Santa Fe NM 87501
wcarr@concho.com
omundsdry@concho.com

**MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P A**

By 
Earl E. DeBrine, Jr.
Jennifer L Bradfute
Post Office Box 2168
Bank of America Centre
500 Fourth Street NW Suite 1000
Albuquerque New Mexico 87103 2168
Telephone 505 848 1800