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

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

CASE NOS. 15830 and 15831

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COG's PRE-HEARING STATEMENT

COG Operating LLC, the applicant in the above referenced matter, submits this Pre-

Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

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

ATTORNEY

2011 OCT -5 P 4: Michael H. Feldewert, Esq. Jordan L. Kessler, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 — (505) 988-4421 (505) 983-6043 Facsimile

OPPONENT

OneEnergy Partners Operating, LLC 2929 Allen Parkway, Suite 200 Houston, Texas 77019

ATTORNEY

Scott Hall, Esq. Montgomery & Andrews, P.A. Post Office Box 2307 Santa Fe, New Mexico 87504-2307 (505) 982-3873 (505) 243-1700 Facsimile

APPLICANT'S STATEMENT OF CASE

In Case No. 15830, COG Operating LLC seeks an order (1) creating a 320-acre, more or

less, spacing and proration unit comprised of the W/2 E/2 of Section 24 and the W/2 E/2 of Section

25, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all

uncommitted interests in the Wolfcamp formation. COG proposes to dedicate the abovereferenced spacing and proration unit as the project area for the proposed **Baseball Cap Federal Com No. 24H Well,** which will be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 25 to a standard bottom hole location in the NW/4 NE/4 (Unit B) of Section 24.

In Case No. 15831, COG seeks an order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the E/2 W/2 of Section 24 and the E/2 W/2 of Section 25, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted interests in the Wolfcamp formation. COG proposes to dedicate the above-referenced spacing and proration unit as the project area for the proposed **Baseball Cap Federal Com No. 26H Well**, which will be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 25 to a standard bottom hole location in the NE/4 NW/4 (Unit C) of Section 24. COG has negotiated in good faith with all parties it seeks to pool for these two cases.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Matt Solomon – Landman	Approx. 15	Approx. 10
Henry Zollinger – Geologist	Approx. 10	Approx. 4

PROCEDURAL MATTERS

COG respectfully requests that Case No. 15830 and 15831 be consolidated for hearing.

2

Respectfully submitted,

HOLLAND & HART LLP

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ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2017, I served a copy of the foregoing document to the

following counsel of record via electronic mail:

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Jordan L. Kessler