

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

**APPLICATION OF APACHE CORPORATION
FOR APPROVAL OF THE THUNDERBIRD
EXPLORATORY UNIT, EDDY COUNTY,
NEW MEXICO.**

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2018 JAN -4 P 4: 05
CASE NO. 15874

COG's PRE-HEARING STATEMENT

COG Operating LLC ("COG") submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Apache Corporation

ATTORNEY

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STATEMENT OF THE CASE

Apache Corporation, ("Apache") seeks an order approving its proposed "Thunderbird Resource Development Unit" comprised of federal and state lands in Eddy County, New Mexico. See Application at p. 1. The proposed unitized interval is the stratigraphic equivalent of the top of the Yeso formation encountered at a measured depth of 4,233' down to the stratigraphic equivalent of the top of the Tubb formation at a measured depth of 5,554' as encountered in the Aspen Federal Com #1 well (API No. 30-015-31656) located in NE/4SW/4, Section 31, Township 16 South, Range 31 East, Eddy County, New Mexico.

COG is the operator of offsetting oil and gas acreage within the proposed unitized interval. COG objects to the boundaries of the proposed unitized area on the grounds that it will strand acreage, will impair COG's correlative rights and cause waste.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Adam Reker – Landman	Approx. 10	Approx. 5
Tim Baker - Landman	Approx. 15	Approx. 5
Candice Pettijohn – Geologist	Approx. 10	Approx. 5
George Freeman and/or Bryan Montgomery – Engineer	Approx. 15	Approx. 4

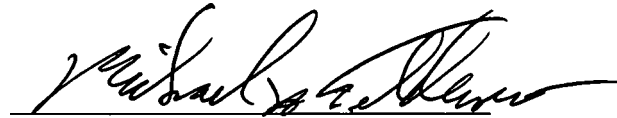
PROCEDURAL MATTERS

COG is seeking to continue this matter to the January 25, 2018, docket to allow time to confer with the BLM about surface development locations in the affected area outside the proposed unit boundaries. The BLM has scheduled a meeting on Friday, January 5th, to address these issues

and the decision by the BLM following the scheduled meeting will impact available development options.

Respectfully submitted,

HOLLAND & HART LLP



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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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