

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

**APPLICATION OF ROVER OPERATING,  
LLC FOR STATUTORY UNITIZATION,  
EDDY COUNTY, NEW MEXICO.**

OCT 25 2018 PM04:18

**CASE NO. 16354**

**APPLICATION OF ROVER OPERATING,  
LLC FOR APPROVAL OF A SECONDARY  
RECOVERY PROJECT, EDDY COUNTY,  
NEW MEXICO.**

**CASE NO. 16355**

**COG's AMENDED PRE-HEARING STATEMENT**

COG Operating LLC ("COG"), the opponent in the above-referenced matters, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Rover Operating, LLC

**ATTORNEY**

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*Attorney for Rover Operating, LLC*

**OPPONENT**

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

**ATTORNEY**

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*Attorneys for COG Operating LLC*

**APPLICANT’S STATEMENT OF CASE**

Rover Operating, LLC (“Rover”) seeks an order statutorily unitizing mineral interest owners for the purpose of instituting a secondary recovery project. Rover seeks to unitize 639.60 acres comprised of Section 2, Township 17 South, Range 31 East, NMPM, Eddy County, New Mexico, from the top of the Loco Hills Sand to the base of the Lovington Sand.

**OPPONENT’S STATEMENT OF CASE**

COG owns mineral rights in said Section 2 directly below the proposed unitized formation. COG objects to the proposed secondary recovery project due to 1) pressure issues associated with drilling through the injection interval; and 2) the impact of injection on older existing wells in the area. COG will be requesting that the Division impose of certain conditions to address these issues into any order resulting from this hearing.

**OPPONENT’S PROPOSED EVIDENCE**

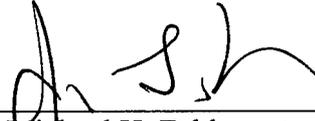
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Stuart Dirks – Landman	Approx. 15	Approx. 4
Harvin Broughton – Geologist	Approx. 15	Approx. 5
Jayne Junell – Reservoir Engineer	Approx. 15	Approx. 5
Ryan Murphy – Production Engineer	Approx. 15	Approx. 5
Parker Simmons – Drilling Engineer	Approx. 15	Approx. 5

**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 October 25, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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