

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

**APPLICATION OF COG OPERATING LLC FOR
COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.**

CASE NO. 20070

**APPLICATION OF COG OPERATING LLC FOR
COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.**

CASE NO. 20071

**APPLICATION OF COG OPERATING LLC FOR
COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.**

CASE NO. 20072

**APPLICATION OF COG OPERATING LLC FOR
COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.**

CASE NO. 20073

COG'S CONSOLIDATED PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

COG Operating LLC
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ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In Case No. 20070, COG seeks an order pooling all uncommitted interests in the Bone Spring formation in the 320-acre horizontal spacing unit comprised of the E/2 E/2 of Section 24

and the E/2 E/2 of Section 25, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico. This horizontal spacing until will be dedicated to the proposed **Baseball Cap Federal Com No. 601H Well**, which will be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 25 to bottom hole location in the NE/4 NE/4 (Unit A) of Section 24. The completed interval for this well will remain within the standard setback as required by the Statewide rules for oil wells.

In Case No. 20071, COG seeks an order pooling all uncommitted interests in Bone Spring formation in the 320-acre horizontal spacing unit comprised of the W/2 W/2 of Section 24 and the W/2 W/2 of Section 25, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico. This horizontal spacing until will be dedicated to two initial wells: the proposed **Baseball Cap Federal Com No. 607H Well** and the proposed **Baseball Cap Federal Com No. 608H Well**. These wells will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 25 to bottom hole location in the NW/4 NW/4 (Unit D) of Section 24. The completed interval for the **Baseball Cap Federal Com No. 608H Well** will remain within the standard setback as required by the Statewide rules for oil wells. The **Baseball Cap Federal Com No. 607H Well** is at an unorthodox location. COG will apply administratively for approval of an unorthodox location. Because the proposed wells will be simultaneously drilled and completed, COG requests an extension of the time period to drill and complete the initial well from 120 days to 365 days.

In Case No. 20072, COG seeks an order pooling all uncommitted interests in Wolfcamp formation in the 320-acre horizontal spacing unit comprised of the E/2 E/2 of Section 24 and the E/2 E/2 of Section 25, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico. This horizontal spacing until will be dedicated to the two initial wells: the proposed **Baseball Cap**

Federal Com No. 701H Well, and the proposed **Baseball Cap Federal Com No. 702H Well**. These wells will be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 25 to bottom hole location in the NE/4 NE/4 (Unit A) of Section 24. The completed interval for each well will remain within the standard setback as required by the Statewide rules for oil wells. Because the proposed wells will be simultaneously drilled and completed, COG requests an extension of the time period to drill and complete the initial well from 120 days to 365 days.

In Case No. 20073, COG seeks an order pooling all uncommitted interests in Wolfcamp formation in the 320-acre horizontal spacing unit comprised of the W/2 W/2 of Section 24 and the W/2 W/2 of Section 25, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico. This horizontal spacing until will be dedicated to the two initial wells: the proposed the proposed **Baseball Cap Federal Com No. 707H Well** and the proposed **Baseball Cap Federal Com No. 708H Well**. These wells will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 25 to bottom hole location in the NW/4 NW/4 (Unit D) of Section 24. The completed interval for each well will remain within the standard setback as required by the Statewide rules for oil wells. Because the proposed wells will be simultaneously drilled and completed, COG requests an extension of the time period to drill and complete the initial well from 120 days to 365 days.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Matt Solomon, Landman	Approx. 20	Approx. 10
Brian Sitek, Geologist	Approx. 10	Approx. 6

PROCEDURAL MATTERS

COG respectfully requests that Case Nos. 20070-20073 be consolidated for hearing. If unopposed, these cases will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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