

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

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

**CASE NO.** 20524

**APPLICATION**

COG Operating LLC ("COG"), through its undersigned attorneys, hereby files this application with the Oil Conservation Division pursuant to the provisions of N.M. Stat. Ann. § 70-2-17, for an order pooling all uncommitted interests in the Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Sections 6 and 7, Township 25 South, Range 30 East, NMPM, Eddy County, New Mexico. In support of its application, COG states:

1. COG Operating LLC (OGRID No. 229137) is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon.
2. Applicant seeks to dedicate the above-referenced horizontal spacing unit to its proposed initial **Huevos Rancheros State Com 501H** and **Huevos Rancheros State Com 502H** wells to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 7 to a bottom hole location in NE/4 NE/4 (Unit A) of Section 6.
3. The completed interval for the **Huevos Rancheros State Com 501H** and **Huevos Rancheros State Com 502H** wells will not comply with the applicable setback requirements and COG will apply separately for administrative approval of the unorthodox locations.

4. Because the proposed wells will be simultaneously drilled and completed, Applicant requests an extension of the time period to drill and complete the initial well from 120 days to 365 days.

5. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all mineral interest owners in the subject spacing unit.

6. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

7. In order to permit Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this horizontal spacing unit should be pooled, and Applicant should be designated the operator of these proposed horizontal wells and spacing unit.

WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on June 13, 2019, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the horizontal spacing unit and approving the initial wells thereon;
- B. Authorizing an extension of the 120-day requirement to drill and complete the initial wells;
- C. Designating Applicant as operator of this spacing unit and the horizontal wells to be drilled thereon;
- D. Authorizing Applicant to recover its costs of drilling, equipping and completing the wells;

- E. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells against any working interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

HOLLAND & HART LLP

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**ATTORNEYS FOR COG OPERATING LLC**

CASE 20524:

**Application of COG Operating LLC for compulsory pooling, Eddy County, New Mexico.** Applicant in the above-styled cause seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 6 and 7, Township 25 South, Range 30 East, NMPM, Eddy County, New Mexico. This standard horizontal spacing unit will be initially dedicated to the proposed **Huevos Rancheros State Com 501H** and **Huevos Rancheros State Com 502H** wells to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 7 to a bottom hole location in NE/4 NE/4 (Unit A) of Section 6. The completed interval for the wells will be unorthodox. Also, to be considered will be an extension of the timeframe to drill and complete the initial wells, the cost of drilling and completing the wells, the allocation of the costs thereof, the actual operating costs and charges for supervision, the designation of applicant as operator of the wells, and the imposition of a 200% charge for risk involved in drilling and completing the wells. Said area is located approximately 11 miles southeast of Malaga, New Mexico.