



**MONTGOMERY  
& ANDREWS**

**J. SCOTT HALL**

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2009 APR 9 PM 4 24

April 9, 2009

Florene Davidson  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

**Re: Application of RSC Resources Limited Partnership to Allow Two  
Operators on a Well Unit, Eddy County, New Mexico  
NMOCD Case No. 14308**

Dear Ms. Davidson:

Attached for filing is an original and three copies of the following two pleadings:

1. Entry of Appearance
2. Pre-Hearing Statement '

I have included an extra copy of each to be conformed.

Thank you.

Very truly yours,

*Karen Williams*

Karen Williams  
Assistant to J. Scott Hall

:kw

Enclosures

{00074952-1}

**REPLY TO:**

325 Paseo de Peralta  
Santa Fe, New Mexico 87501  
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STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION

APPLICATION OF RSC RESOURCES LIMITED  
PARTNERSHIP TO ALLOW TWO OPERATORS ON  
A WELL UNIT, EDDY COUNTY, NEW MEXICO

CASE NO. 14,308

ENTRY OF APPEARANCE

Comes now COG Operating LLC by and through its undersigned attorneys,  
Montgomery & Andrews, P.A., (J. Scott Hall) and hereby enters its appearance in the  
above matter.

MONTGOMERY & ANDREWS, P.A.

By:



J. Scott Hall  
Attorneys for COG Operating LLC  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was faxed to  
counsel of record on the 9th day of April, 2009, as follows:

James Bruce, Esq.  
P. O. Box 1056  
Santa Fe, NM 87504  
(505) 982-2151 fax

Ocean Munds-Dry, Esq.  
Holland & Hart LLP  
P.O. Box 2208  
Santa Fe, NM 87504-2208  
(505) 983-6043



J. Scott Hall

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

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2009 APR 9 PM 4 25

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF RSC RESOURCES LIMITED  
PARTNERSHIP TO ALLOW TWO OPERATORS ON  
A WELL UNIT, EDDY COUNTY, NEW MEXICO**

**Case No. 14,308**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by COG Operating, LLC as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

RSC Resources LP  
6824 Island Cr.  
Midland, Texas 79709  
Attention: Randy S. Cate

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

Three Span Oil and Gas Company, Inc.  
400 W. Illinois Ave  
Suite 1250  
Midland, TX 79701

**OPPONENT'S ATTORNEY**

Ocean Munds-Dry  
Holland & Hart LLP  
P. O. Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421

**OTHER PARTY**

COG Operating, LLC  
550 W. Texas Ave.  
Suite 100  
Midland, TX 79701

**OTHER PARTY'S ATTORNEY**

J. Scott Hall  
Montgomery & Andrews  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 986-2646

### APPLICANT

Applicant seeks an order approving two operators on non-standard oil spacing and proration unit (project area) comprised of Lot 3, NE/4SW/4, and N/2SE/4 (the N/2 S/2 equivalent) of Section 30, Township 16 South, Range 28 East, NMPM, for the horizontal drilling and operation of its proposed Lucky Wolf "30" Fed. Com. Well No. 1 to the Wolfcamp formation.

### OTHER PARTY

COG Operating LLC ("COG") is the owner of working interests in the N/2 S/2 of Section 30, T16S R28E and is an interested party. COG does not presently plan to present witnesses at the hearing on April 16, 2009, but reserves the right to do so. COG provisionally identifies its witnesses, below.

### OPPONENT

Three Span Oil & Gas, Inc. operates the Crow Flats Federal Com Well No. 1, drilled vertically from a location 1980' FSL and 1980' FWL of the same Section 30 and currently producing from the Wolfcamp formation. This pre-existing well and 40-acre unit are located within the special project area proposed by Applicant (NE/4 SW/4).

This case is related to Case No. 14277 previously heard by the Division, and to Case Nos. 14245 and 14309.

## **PROPOSED EVIDENCE**

### APPLICANT

#### WITNESSES

#### EST. TIME

#### EXHIBITS

### OPPONENT

#### EST. TIME

#### EXHIBITS

#### WITNESSES

### OTHER PARTY

#### WITNESSES

#### EST. TIME

#### EXHIBITS

Jan Spradlin, Landman

20 minutes

Approx. 6

**PROCEDURAL MATTERS**

None at this time.

MONTGOMERY & ANDREWS, P.A.

By: 

J. Scott Hall, Esq.

Post Office Box 2307

Santa Fe, New Mexico 87504

(505) 982-3873

Attorneys for COG Operating LLC

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J. Scott Hall