



**MONTGOMERY  
& ANDREWS**

J. SCOTT HALL

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2009 APR 9 PM 4 22

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 for Approval of a  
Non-Standard Oil Spacing and Proration Unit and Compulsory Pooling,  
NMOCD Case No. 14245**

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  
Assistant to J. Scott Hall

:kw  
Enclosures

**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

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APPLICATION OF RSC RESOURCES LIMITED  
PARTNERSHIP FOR APPROVAL OF A NON-  
STANDARD OIL SPACING AND PRORATION UNIT  
AND COMPULSORY POOLING, EDDY COUNTY,  
NEW MEXICO (Reopened)

CASE NO. 14,245

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



J. Scott Hall

STATE OF NEW MEXICO RECEIVED  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION APR 9 PM 4 23

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

APPLICATION OF RSC RESOURCES LIMITED  
PARTNERSHIP FOR A NON-STANDARD OIL  
SPACING AND PRORATION UNIT AND  
COMPULSORY POOLING, EDDY COUNTY,  
NEW MEXICO

Case No. 14,245

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

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

OPPONENT'S ATTORNEY

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

## STATEMENT OF THE CASE

### APPLICANT

Applicant seeks an order approving a non-standard oil spacing and proration unit (project area) comprised of Lot 4, SE/4SW/4, and S/2SE/4 (the S/2S/2 equivalent) of Section 30, Township 16 South, Range 28 East, NMPM, to form a non-standard 162.77-acre oil spacing and proration unit. Applicant also seeks to force-pool unjoined interests in all formations or pools developed on 40-acre spacing, including the Wolfcamp formation, for the horizontal drilling and operation of its proposed Lucky Wolf "30" Fed. Com. Well No. 1.

### OTHER PARTY

COG Operating LLC ("COG") is the owner of certain lease working interests in the S/2 of Section 30, T16S R28E and as such, is an interested party. This case is related to Case No. 14277 previously heard by the Division. It is also related to Case Nos. 14308 and 14309. COG does not presently plan to call witnesses at the April 16, 2009 hearing, but reserves the right to do so. COG provisionally identifies its witness below.

## PROPOSED EVIDENCE

### APPLICANT

#### WITNESSES

#### EST. TIME

#### EXHIBITS

### OPPONENT

#### EST. TIME

#### EXHIBITS

#### WITNESSES

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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