



**MONTGOMERY  
& ANDREWS**  
LAW FIRM

J. SCOTT HALL

Cell: (505) 670-7862

Email: shall@montand.com

Reply To: Santa Fe Office

www.montand.com

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2010 MAR -2 P 4:40

March 2, 2010

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

**Re: In the Matter of the Application of COG Operating, LLC for Authorization to  
Conduct Injection Operations for Evaluation for Secondary Recovery  
Operations, Eddy County, New Mexico, NMOCD Case No. 14455**

Dear Ms. Davidson:

Attached for filing is an original and one copy of an Application in the above-referenced matter. I have included an extra copy to be conformed.

Please set this matter for hearing on April 1, 2010. Thank you.

Very truly yours,

Karen Williams  
Assistant to J. Scott Hall

:kw  
Enclosures

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**REPLY TO:**

325 Paseo de Peralta  
Santa Fe, New Mexico 87501  
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307  
Santa Fe, New Mexico 87504-2307

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6301 Indian School Road NE, Suite 400  
Albuquerque, New Mexico 87110  
Telephone (505) 884-4200 • Fax (505) 888-8929

Post Office Box 36210  
Albuquerque, New Mexico 87176-6210

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

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**IN THE MATTER OF THE APPLICATION OF COG  
OPERATING, LLC FOR AUTHORIZATION TO  
CONDUCT INJECTION OPERATIONS FOR  
EVALUATION FOR SECONDARY RECOVERY  
OPERATIONS, EDDY COUNTY, NEW MEXICO.**

CASE NO. 14455

**APPLICATION**

COG Operating, LLC, ("COG"), through its undersigned counsel, Montgomery and Andrews, P.A. (J. Scott Hall, Esq.), applies pursuant to 19.15.26.8 NMAC for an order authorizing the injection of water into the Paddock and Blinebry members of the Glorieta-Yeso formation, Empire Yeso Pool (96210) in Eddy County, New Mexico. In support of its Application, COG states:

1. Applicant is the operator of the following wells:

Continental A State No. 11  
API No. 30-015-34742  
1450' FNL & 1907' FWL (Unit F)  
Section 30  
T-17-S, R-29-E, NMPM  
Eddy County, New Mexico

Continental A State No. 12  
API No. 30-015-35052  
330' FNL & 583' FWL (Unit D)  
Section 30  
T-17-S, R-29-E, NMPM  
Eddy County, New Mexico

2. Continental A State No. 11 well is drilled to a total depth of 5757' and the Continental A State No. 12 to a total depth of 5460'. Both wells were originally operated as producing oil wells. COG proposes to convert and utilize the wells for injection of water through a closed system into the Paddock and Blinebry formations, Empire Yeso Pool, through

perforations within the depths of 3,926' to 4,277' (Paddock) and 4,436' to 5,088' (Blinebry) (Continental A State Well No. 11). For the Continental A State No. 12, the perforations will be within the depths of 3,811' to 4,044' (Paddock) and 4,400' to 5,297' (Blinebry). Data from injection will be utilized to evaluate the feasibility of secondary recovery operations in the referenced formations.

3. Injection operations through the well will be conducted at an anticipated average daily injection pressure of 2,000 psi with a maximum surface injection pressure of 2,000 psi or as permitted by the Division, in excess of a 0.2 psi/ft. gradient. Applicant proposes injection of water at average daily rates of approximately 1,000 bbls and at maximum daily rates of approximately 2,000 bbls. The source of the injected fluids will be formation water from production wells that have been drilled and are scheduled to be drilled in the area.

4. Applicant's proposed injection operation can be conducted in a safe and responsible manner without causing waste, impairing correlative rights or endangering fresh water, public health or the environment.

WHEREFORE, Applicant requests that this Application be set for hearing before a duly appointed examiner of the Oil Conservation Division on April 1, 2010 and that after notice and hearing as required by law, the Division enter its Order approving the conversion of the Continental A State No. 11 and Continental A State No. 12 Wells for the injection of water into the Paddock and Blinebry members of the Glorieta-Yeso formation at the intervals and at the pressures, volumes and rates indicated, and making such other and further provisions as the Division determines appropriate.

Montgomery and Andrews, P.A.

By: J. Scott Hall

J. Scott Hall, Esq.

Post Office Box 2307

Santa Fe, New Mexico 87504

(505) 982-3873

(505) 982-4289

Attorneys for COG Operating, LLC

00168403

*Case No. 14455 Application of COG Operating, LLC for authorization to conduct injection operations for evaluation for secondary recovery operations, Eddy County, New Mexico.*  
Applicant seeks approval to convert the following wells for the injection:

2010 MAR -2 P 4: 40

Continental A State No. 11  
API No. 30-015-34742  
1450' FNL & 1907' FWL (Unit F)  
Section 30  
T-17-S, R-29-E, NMPM  
Eddy County, New Mexico

Continental A State No. 12  
API No. 30-015-35052  
330' FNL & 583' FWL (Unit D)  
Section 30  
T-17-S, R-29-E, NMPM  
Eddy County, New Mexico

COG proposes to convert and utilize the well for injection of water through a closed system into the Paddock and Blinebry members of the Glorieta-Yeso formation, Empire Yeso Pool (96210) through perforations within the depths of 3,926' to 4,277' (Paddock) and 4,436' to 5,088' (Blinebry) (Continental A State Well No. 11). For the Continental A State No. 12, the perforations will be within the depths of 3,811' to 4,044' (Paddock) and 4,400' to 5,297' (Blinebry). Injection operations through the well will be conducted at an anticipated average daily injection pressure of 2,000 psi with a maximum surface injection pressure of 2,000 psi or as permitted by the Division, in excess of a 0.2 psi/ft. gradient. Applicant proposes injection of water at average daily rates of approximately 1,000 bbls and at maximum daily rates of approximately 2,000 bbls. The source of the injected fluids will be formation water from area production wells. The well is located approximately 1 mile southwest of Loco Hills, New Mexico.