

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

**APPLICATION OF COLGATE OPERATING, LLC
FOR COMPULSORY POOLING IN
EDDY COUNTY, NEW MEXICO**

CASE NO. 21339

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by COLGATE OPERATING, LLC, by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:	Colgate Operating, LLC
ATTORNEY:	Ernest L. Padilla Padilla Law Firm, P.A. P.O. Box 2523 Santa Fe, New Mexico 87504 (505) 988-7577 padillalaw@qwestoffice.net
OPPOSITION OR OTHER PARTY:	EOG Resources, Inc.
ATTORNEY:	Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Post Office Box 2208 Santa Fe, New Mexico 87504 TEL: (505) 988-4421 FAX: (505) 983-6043 Facsimile mfeldewert@hollandhart.com agrarkin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order proposing order pooling all mineral interests within Palmillo Bone Spring (Pool Code 96413), underlying the N/2 N/2 of Section 22, Township 19 South,

Range 28 East, NMPM, Eddy County, New Mexico Applicant seeks to dedicate the above referenced horizontal spacing unit to the following four initial wells:

- A. **Toro 22 Fed State Com 121H**
 SHL: Unit E of Section 22, Township 19 South, Range 28 East, NMPM.
 BHL: Unit A of Section 22, Township 19 South, Range 28 East, NMPM.
 Completion Target: 2nd Bone Spring Sand at approx 7500 feet TVD.
 Well Orientation: West to East
 Completion Location: standard;
- B. **Toro 22 Fed State Com 131H**
 SHL: Unit E of Section 22, Township 19 South, Range 28 East, NMPM.
 BHL: Unit A of Section 22, Township 19 South, Range 28 East, NMPM.
 Completion Target: 3rd Bone Spring Sand at approx 8700 feet TVD.
 Well Orientation: West to East
 Completion Location: standard.

These wells are located approximately 13 miles SW of Loco Hills, New Mexico.

OPPOSITION OR OTHER PARTY:

PROPOSED EVIDENCE

APPLICANT

WITNESSES		EST. TIME	EXHIBITS
Name	Title	Est. time	Exhibits
Mark Hajdik	Landman	15 minutes	Approximately 6
Sergio Ojeda	Geologist	15 minutes	Approximately 10

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

None.

PADILLA LAW FIRM, P.A.

/s/ Ernest L. Padilla

Ernest L. Padilla

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CERTIFICATE OF SERVICE

I certify that on July 16, 2020, I served a copy of the foregoing pleading by electronic mail to:

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