

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

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

CASE NO. 21321

**COG OPERATING LLC'S CONSOLIDATED
PRE-HEARING STATEMENT**

COG Operating LLC, the applicant in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Commission.

APPEARANCES

APPLICANT

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OPPOSING PARTY

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STATEMENT OF THE CASE

In **Case No. 20923**, Applicant in the above-styled cause seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a standard 640-acre, more

or less, horizontal spacing unit comprised of the Lots 1-2, S/2NE/4, and the SE/4 (E/2 equivalent) of irregular Section 4, and the E/2 of Section 9, Township 24 South, Range 32 East, Lea County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The Mastiff Fed Com #201H, the Mastiff Fed Com #202H, the Mastiff Fed Com #301H, the Mastiff Fed Com #302H, Mastiff Fed Com #501H, and the Mastiff Fed Com #502H wells to be drilled from surface hole locations in NE/4NE/4 (Lot 1) of Section 4 to bottom hole locations in the SE/4SE/4 (Unit P) of Section 9.
- The Mastiff Fed Com #203H, the Mastiff Fed Com #303H, the Mastiff Fed Com #304H, the Mastiff Fed Com #305H, the Mastiff Fed Com #503H, and the Mastiff Fed Com #504H wells to be drilled from surface hole locations in NW/4NE/4 (Lot 2) of Section 4 to bottom hole locations in the SW/4SE/4 (Unit O) of Section 9.

The completed intervals for the proposed Mastiff Fed Com #202H well will be within 330' of the quarter-quarter line separating the W/2E/2 and the E/2E/2 of Sections 4 and 9 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit. Also, to be considered will be the cost of drilling and completing the wells, the allocation of the cost thereof, the actual operating costs and charges for supervision, the designation of applicant as operator, and the imposition of 200% charge for risk involved in drilling and completing each well. Said area is located approximately 23 miles east of Loving, New Mexico.

In **Case No. 20924**, Applicant in the above-styled cause seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a standard 640-acre, more or less, horizontal spacing unit comprised of Lots 3-4, the S/2NW/4, and the SW/4 (W/2 equivalent) of irregular Section 4, Township 24 South, Range 32 East, and the W/2 of Section 33,

Township 23 South, Range 32 East, Lea County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The Mastiff Fed Com #204H, the Mastiff Fed Com #306H, and the Mastiff Fed Com #307H wells to be drilled from surface hole locations in SE/4SW/4 (Unit N) of Section 4 to bottom hole locations in the NE/4NW/4 (Unit C) of Section 33,
- The Mastiff Fed Com #205H, the Mastiff Fed Com #308H, the Mastiff Fed Com #309H, the Mastiff Fed Com #310H, the Mastiff Fed Com #505H, the Mastiff Fed Com #506H, the Mastiff Fed Com #507H wells to be drilled from surface hole locations in SW/4SW/4 (Unit M) of Section 4 to bottom hole locations in the NW/4NW/4 (Unit D) of Section 33.

The completed intervals for the proposed Mastiff Fed Com #308H well will be within 330' of the quarter-quarter line separating the W/2W/2 and the E/2W/2 of Sections 4 and 33 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit. Also, to be considered will be the cost of drilling and completing the wells, the allocation of the cost thereof, the actual operating costs and charges for supervision, the designation of applicant as operator, and the imposition of 200% charge for risk involved in drilling and completing each well. Said area is located approximately 23 miles east of Loving, New Mexico.

In **Case No. 20925**, Applicant in the above-styled cause seeks an order pooling all uncommitted interest owners in the Wolfcamp formation underlying a standard 640-acre, more or less, horizontal spacing unit comprised of Lots 1-2, S/2NE/4, and the SE/4 (E/2 equivalent) of irregular Section 4 and the E/2 of Section 9, Township 24 South, Range 32 East, Lea County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The Mastiff Fed Com #701H and the Mastiff Fed Com #702H wells to be drilled from surface hole locations in NE/4NE/4 (Lot 1) of Section 4 to bottom hole locations in the SE/4SE/4 (Unit P) of Section 9.
- The Mastiff Fed Com #703H, Mastiff Fed Com #704H, and the Mastiff Fed Com #705H wells to be drilled from surface hole locations in NW/4NE/4 (Lot 2) of Section 4 to bottom hole locations in the SW/4SE/4 (Unit O) of Section 9.

The completed intervals for the proposed Mastiff Fed Com #703H well will be within 330' of the quarter-quarter line separating the W/2E/2 and the E/2E/2 of Sections 4 and 9 to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit. Also, to be considered will be the cost of drilling and completing the wells, the allocation of the cost thereof, the actual operating costs and charges for supervision, the designation of applicant as operator, and the imposition of 200% charge for risk involved in drilling and completing each well. Said area is located approximately 23 miles east of Loving, New Mexico.

In **Case No. 20926**, Applicant in the above-styled cause seeks an order pooling all uncommitted interest owners in the Wolfcamp formation underlying a standard 640-acre, more or less, horizontal spacing unit comprised of Lots 1-2, the S/2NW/4, and the SW/4 (W/2 equivalent) of irregular Section 4, Township 24 South, Range 32 East, and the W/2 of Section 33, Township 23 South, Range 32 East, Lea County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- The Mastiff Fed Com #706H, the Mastiff Fed Com #707H, and the Mastiff Fed Com #708H wells to be drilled from surface hole locations in SE/4SW/4 (Unit N) of Section 4 to bottom hole locations in the SE/4SW/4 (Unit N) of Section 33.

- The Mastiff Fed Com #709H and the Mastiff Fed Com #710H wells to be drilled from surface hole locations in SW/4SW/4 (Unit M) of Section 4 to bottom hole locations in the SW/4SW/4 (Unit M) of Section 33.

The completed intervals for the proposed Mastiff Fed Com #708H well will be within 330' of the quarter-quarter line separating the W/2W/2 and the E/2W/2 of Section 4, Township 24 South, Range 32 East, and Section 33, Township 23 South, Range 32 East, to allow inclusion of this acreage into a standard 640-acre horizontal well spacing unit. Also, to be considered will be the cost of drilling and completing the wells, the allocation of the cost thereof, the actual operating costs and charges for supervision, the designation of applicant as operator, and the imposition of 200% charge for risk involved in drilling and completing each well. Said area is located approximately 23 miles east of Loving, New Mexico.

PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	ESTIMATED EXHIBITS
Adam Reker Petroleum Landman	30 Minutes	5
John Bertalott - Geologist	20 Minutes	12
Michael Burkard Reservoir Engineer	30 Minutes	23

PROCEDURAL MATTERS

COG Operating LLC requests case numbers 20923, 20924, 20925 and 20926 be consolidated at hearing.

Respectfully submitted,

COG OPERATING LLC

/s/ Michael Rodriguez

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ATTORNEYS FOR COG OPERATING LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2020, I filed with the Division clerk the foregoing document and served a copy of the foregoing document to the following counsel of record via

Electronic Mail:

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/s/ Michael Rodriguez

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