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

APPLICATION OF TAP ROCK OPERATING, LLC FOR APPROVAL OF STANDARD HORIZONTAL SPACING UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

CASE NO. 25317

TAP ROCK OPERATING, LLC'S PRE-HEARING STATEMENT

Tap Rock Operating, LLC, ("Tap Rock"), submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

Tap Rock Operating, LLC Miguel A. Suazo James P. Parrot

Jacob L. Everhart Ryan McKee

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INTERESTED PARTY ATTORNEY

EOG Resources, Inc. Jordan L. Kessler

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APPLICANT'S STATEMENT OF CASE

In this case, Tap Rock seeks orders to approve standard 1,283.04-acre, more or less, standard horizontal spacing unit ("HSU") composed of all of Sections 3 and 4, Township 25 South, Range 25 East, N.M.P.M., Eddy County, New Mexico (the "Application Lands"), and to pool all uncommitted mineral interests in the Purple Sage; Wolfcamp Gas Pool (98220), designated as a gas pool, underlying said HSU.

Under Case 25317, Tap Rock seeks to pool the <u>Purple Sage</u>; <u>Wolfcamp Pool</u> underlying the Application Lands and seeks to dedicate the HSU to the following proposed wells:

- A. **Beer 30 Fed Com #202H** (API No. Pending), which is a gas well that will be horizontally drilled from a surface location in the NE/4 NE/4 (Lot 1) of Section 3, 2 Township 25 South, Range 25 East, to a bottom hole location in the Purple Sage-Wolfcamp Gas Pool in the SW/4 NW/4 (Unit E) of Section 4, Township 25 South, Range 25 East;
- B. **Beer 30 Fed Com #204H** (API No. Pending), which is a gas well that will be horizontally drilled from a surface location in the NE/4 SE/4 (Unit I) of Section 3, Township 25 South, Range 25 East, to a bottom hole location in the Purple Sage-Wolfcamp Gas Pool in the SW/4 SW/4 (Unit M) of Section 4, Township 25 South, Range 25 East;
- C. **Beer 30 Fed Com #211H** (API No. Pending), which is a gas well that will be horizontally drilled from a surface location in the NE/4 NE/4 (Lot 1) of Section 3, Township 25 South, Range 25 East, to a bottom hole location in the Purple Sage-Wolfcamp Gas Pool in the NW/4 NW/4 (Lot 4) of Section 4, Township 25 South, Range 25 East, and;

D. **Beer 30 Fed Com #213H** (API No. Pending), which is a gas well that will be horizontally drilled from a surface location in the NE/4 SE/4 (Unit I) of Section 3, Township 25 South, Range 25 East, to a bottom hole location in the Purple Sage-Wolfcamp Gas Pool in the NW/4 SW/4 (Unit L) of Section 4, Township 25 South, Range 25 East.

The wells are orthodox in their location as defined by 19.15.16.15.(C) NMAC and Special Pool Order No. R-14262 for the Purple Sage-Wolfcamp Pool (98220), and the take points and laterals comply with the Special Pool Order No. R-14262 for the Purple Sage-Wolfcamp Pool (98220). Also to be considered will be the cost of drilling and completing the Wells and the allocation of the cost, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The wells and lands are located approximately 1 mile southeast of Whites City, New Mexico.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Matt Phillips, Land Manager	Affidavit	Approx. 5
Eli DenBesten, Senior Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

If uncontested at the hearing, Tap Rock intends to present this case by affidavit.

Dated this 1st day of May, 2025.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:

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Attorneys for Tap Rock Operating, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 1st day of May 2025, as follows:

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State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

Action 457843

QUESTIONS

Operator:	OGRID:
TAP ROCK OPERATING, LLC	372043
523 Park Point Drive	Action Number:
Golden, CO 80401	457843
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	2	
Testimony time (in minutes)	20	