

**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. 25316**

**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**

Tap Rock Operating, LLC

**ATTORNEY**

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**INTERESTED PARTY**

COG Operating LLC  
Concho Oil & Gas LLC

**ATTORNEY**

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### **APPLICANT'S STATEMENT OF CASE**

In this case, Tap Rock seeks orders to approve standard 480-acre, more or less, standard horizontal spacing unit ("HSU") composed of the N/2 N/2 of Sections 11 and 12, Township 25 South, Range 25 East, N.M.P.M., and the N/2 N/2 of Section 7, Township 25 South, Range 26 East, N.M.P.M., Eddy County, New Mexico (the "Application Lands"), and to pool all uncommitted mineral interests in the Cottonwood Draw; Bone Spring Pool (97494), designated as an oil pool, underlying said HSU.

Under **Case 25316**, Tap Rock seeks to pool the Cottonwood Draw; Bone Spring Pool underlying the Application Lands and seeks to dedicate the HSU to the following proposed well:

A. **High Life Fed Com #151H** (API No. 30-15-54522), which is an oil well that will be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 10, Township 25 South, Range 25 East, to a bottom hole location in the Cottonwood Draw; Bone Spring Pool in the NE/4 NE/4 (Unit A) of Section 7, Township 25 South, Range 26 East.

The well is orthodox in its location as defined by 19.15.16.15.(C) NMAC, and the take points and laterals comply with Statewide Rules for setbacks under 19.15.16.15.(C) NMAC. Also to be considered will be the cost of drilling and completing the Well and the allocation of the cost, the designation of Applicant as the operator of the Well, and a 200% charge for the risk involved in drilling and completing the Well.

The well and lands are located approximately 2 miles south 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 1<sup>st</sup> 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 2<sup>nd</sup> day of May 2025, as follows:

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State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
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QUESTIONS

Action 458194

QUESTIONS

Operator: TAP ROCK OPERATING, LLC 523 Park Point Drive Golden, CO 80401	OGRID: 372043
	Action Number: 458194
	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