

**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. 25782

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

Miguel A. Suazo
James P. Parrot
Jacob L. Everhart
Ryan McKee
Beatty & Wozniak, P.C.
500 Don Gaspar Ave.,
Santa Fe, NM 87505
(505) 946-2090
Fax: 800-886-6566
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jeverhart@bwenergylaw.com
rmckee@bwenergylaw.com

INTERESTED PARTY

Sarvis Permian Land Fund I, LLC
U.S. Energy Development Corporation
Sarvis Rockmont Permian Land Fund, LLC

ATTORNEY

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
agrarkin@hollandhart.com
pmvance@hollandhart.com
astarnes@hollandhart.com

APPLICANT'S STATEMENT OF CASE

In this case, Tap Rock seeks orders to approve a standard 1,280-acre, more or less, horizontal spacing unit ("HSU") composed of All of Sections 3 and 10, Township 26 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 Pool (98220), designated as a gas pool, underlying said HSU.

Under **Case 25782**, Tap Rock seeks to pool the Purple Sage; Wolfcamp Pool underlying the Application Lands and seeks to dedicate the HSU to the following proposed wells:

A. **Pabst Fed Com #202H** (API No. 30-015-57538), which is a gas well that will be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 3, Township 26 South, Range 25 East, to a bottom hole location in the Purple Sage; Wolfcamp Pool in the SE/4 SW/4 (Unit N) of Section 10, Township 26 South, Range 25 East;

B. **Pabst Fed Com #204H** (API No. 30-015-57537), which is a gas well that will be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 3, Township 26 South, Range 25 East, to a bottom hole location in the Purple Sage; Wolfcamp Pool in the SE/4 SE/4 (Unit P) of Section 10, Township 26 South, Range 25 East;

C. **Pabst Fed Com #211H** (API No. 30-015-57536), which is a gas well that will be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 3, Township 26 South, Range 25 East, to a bottom hole location in the Purple Sage; Wolfcamp Pool in the SW/4 SW/4 (Unit M) of Section 10, Township 26 South, Range 25 East; and

D. **Pabst Fed Com #213H** (API No. 30-015-57535), which is a gas well that will be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 3, Township 26 South, Range 25 East, to a bottom hole location in the Purple Sage; Wolfcamp Pool in the SW/4 SE/4 (Unit O) of Section 10, Township 26 South, Range 25 East.

The wells are orthodox in their locations 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 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 7 miles south of Whites City, New Mexico.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Erica Shewmaker, Senior Landman	Affidavit	Approx. 5
Matt Jones, Vice President of Geoscience	Affidavit	Approx. 5

PROCEDURAL MATTERS

If uncontested at the hearing, Tap Rock intends to present these cases by affidavit.

Dated this 31st day of December, 2025.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: 

Miguel A. Suazo

James P. Parrot

Jacob L. Everhart

Ryan McKee

500 Don Gaspar Ave.,

Santa Fe, NM 87505

(505) 946-2090

msuazo@bwenergylaw.com

jparrot@bwenergylaw.com

jeverhart@bwenergylaw.com

rmckee@bwenergylaw.com

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 31st day of December 2025, as follows:

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

agrarkin@hollandhart.com

pmvance@hollandhart.com

astarnes@hollandhart.com

*Attorneys for Sarvis Permian Land Fund I, LLC,
U.S. Energy Development Corporation,
and Sarvis Rockmont Permian Land Fund, LLC*



Rachael Ketchledge

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 539311

QUESTIONS

Operator: TAP ROCK OPERATING, LLC 1700 Lincoln St Denver, CO 80203	OGRID: 372043
	Action Number: 539311
	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)	10