

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF TAP ROCK RESOURCES,
LLC FOR APPROVAL OF A UNIT AGREEMENT,
LEA COUNTY, NEW MEXICO.**

Case No. 21367

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Tap Rock Resources, LLC as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Tap Rock Resources, LLC

Attention: Erica Hixson

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

Franklin Mountain Energy

OPPONENT'S ATTORNEY

Deana Bennett

STATEMENT OF THE CASE

APPLICANT

Tap Rock Resources, LLC seeks an order approving the Unit Agreement for the Seinfeld Unit Area, an exploratory, voluntary unit comprising 4,043.44 acres of federal and fee lands, described as follows:

Township 24 South, Range 35 East, NMPM

Section 22: All

Section 26: All

Section 27: All

Section 28: E/2E/, SW/4NE/4, and W/2SE/42

Section 33: E/2E/2 and W/2NE/4

Section 34: All
Section 35: All

Township 25 South, Range 35 East, NMPM
Section 3: Lots 1-4, S/2N/2

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Erica Hixson (landman)	15 min.	Approx. 6
Emily Lange (geologist)	15 min.	Approx. 4

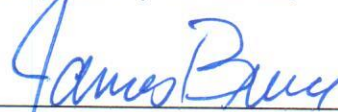
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

Applicant intends to present this case by affidavit.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Tap Rock Resources, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 28th day of July, 2020 by e-mail:

Deana Bennett
dmb@modrall.com



James Bruce