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

APPLICATION OF TAP ROCK RESOURCES, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 16160

PRE-HEARING STATEMENT OF CHEVRON U.S.A. INC.

Chevron U.S.A. Inc. ("Chevron") submits this Pre-Hearing Statement as required by the

rules of the Oil Conservation Division.

APPEARANCES

PARTIES

Applicant Tap Rock Resources, LLC

Chevron U.S.A. Inc.

EOG Resources, Inc.

ATTORNEYS

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STATEMENT OF THE CASE

Tap Rock Resources, LLC's ("Tap Rock's") application requests an order (i) creating a 160-acre non-standard spacing and proration unit (project area) in the Bone Spring formation comprised of the E/2 E/2 of Section 14, Township 24, South, Range 31 East in Eddy County, and (ii) pooling all uncommitted interests in the Bone Spring formation. Tap Rock proposes to dedicate the project area to the Double Diamond 24S31E1414 Well No. 158H, a horizontal well with a surface location in Unit P and a bottom hole location in Unit A of Section 14. The completed interval of the well will be orthodox.

Chevron opposes Tap Rock's application because it has filed a competing application that involves the same acreage and the same formation that are the subject of Tap Rock's application in this case. Chevron's application seeks an order (i) approving a 480-acre, non-standard spacing and proration unit in the E/2 of Section 14 and the SE/4 of Section 11, Township 24 South, Range 31 East in Eddy County, and (ii) pooling all uncommitted mineral interests in the Bone Spring formation underlying that acreage. The Division has docketed Chevron's application as Case No. 16132.

PROPOSED EVIDENCE

WITNESS

ESTIMATED TIME

EXHIBITS

Chris Cooper (Landman) 15 minutes

Approx. 5

Tim O'Toole (Geologist) 15 minutes

Approx. 3

Sean Cheben (Engineer) 15 minutes

Approx. 2

Chevron reserves the right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

Chevron is not aware of any procedural matters to be resolved prior to the hearing.

HINKLE SHANOR LLP

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Counsel for Chevron U.S.A. Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of May, 2018 I served a true and correct copy of the foregoing *Pre-Hearing Statement of Chevron U.S.A. Inc.* via email to:

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Counsel for Douglas McLeod

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