

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

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

CASE NO. 16165

PRE-HEARING STATEMENT

Tap Rock Operating, LLC provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

Tap Rock Operating, LLC

APPLICANT'S ATTORNEYS

Seth C. McMillan
J. Scott Hall
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
Tele (505) 982-3873
smcmillan@montand.com
shall@montand.com

OPPONENT

Unknown.

OPPONENT'S ATTORNEYS

Unknown.

STATEMENT OF THE CASE

Applicant seeks an order approving a non-standard spacing and proration unit comprised of the N/2 of Section 6 and the N/2 of Section 5, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico, pooling all mineral interests in the Wolfcamp formation (Purple Sage-Wolfcamp Pool) underlying the non-standard unit. The unit will be dedicated to Applicant's proposed Pliny the Elder 23S27E0605 #201H well.

PROPOSED EVIDENCE

| <u>APPLICANT'S WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|-------------------------------------|------------------|-----------------|
| Clayton Sporich, Land | 20 min. | 6 |
| Rob Tonnsen, Geologist and Engineer | 20 min. | 4 |

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: Seth C. McMillan
Seth C. McMillan
J. Scott Hall
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873
smcmillan@montand.com
shall@montand.com

Attorneys for Tap Rock Operating, LLC