

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

**APPLICATION OF MATADOR PRODUCTION
COMPANY FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

CASE NO. 20326

PRE-HEARING STATEMENT

TAP ROCK OPERATING, LLC provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

MATADOR PRODUCTION COMPANY APPLICANT'S ATTORNEY:

James Bruce, Esq.
P.O. Box 1056
Santa Fe, New Mexico 87504
Telephone: (505) 982-2043
Email: jamesbruc@aol.com

OPPONENT

TAP ROCK OPERATING, LLC

TAP ROCK'S ATTORNEYS:

Sharon T. Shaheen, Esq.
Seth C. McMillan, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
Telephone: (505) 986-2678
Email: sshaheen@montand.com
smcmillan@montand.com

Dana Arnold, Esq.
Tap Rock Resources, LLC
602 Park Point Drive, Suite 200
Golden, CO 80401
darnold@taprk.com

OTHER PARTY

CONOCOPHILLIPS COMPANY

CONOCOPHILLIPS' ATTORNEYS:

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
HOLLAND & HART, LLP
P.O. Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 998-4421
Email: mfeldewert@hollandhart.com
arankin@hollandhart.com
jbroggi@hollandhart.com

STATEMENT OF THE CASE

Applicant Matador Production Company seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the W/2 of Section 19, Township 24 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, to be dedicated to the Noel Hensley Fed. Com. Well No. 202H and the Noel Hensley Fed. Com. Well No. 222H.

Tap Rock Operating, LLC is owner of an interest in this proposed well.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	----------

OPPONENT TAP ROCK

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	----------

None

OTHER PARTY CONOCOPHILLIPS

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	----------

PROCEDURAL MATTERS

None

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen
Sharon T. Shaheen
Seth C. McMillan
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
Telephone: (505) 982-3873
Email: sshaheen@montand.com
smcmillan@montand.com

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2019, a true and correct copy of the foregoing *Pre-Hearing Statement* was served by electronic mail on the following counsel of record:

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
Telephone: (505) 982-2043
Email: jamesbruc@aol.com

Attorney for Matador Production Company

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
HOLLAND & HART, LLP
P.O. Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 998-4421
Email: mfeldewert@hollandhart.com
arankin@hollandhart.com
jbroggi@hollandhart.com

Attorneys for ConocoPhillips Company

/s/Sharon T. Shaheen
Sharon T. Shaheen