

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

APPLICATION OF TAP ROCK RESOURCES,
LLC, FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO CASE NO. 21609

APPLICATION OF TAP ROCK RESOURCES,
LLC, FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO CASE NO. 21610

APPLICATION OF MATADOR PRODUCTION
COMPANY FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO CASE NO. 21631

APPLICATION OF MATADOR PRODUCTION
COMPANY FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO CASE NO. 21632

APPLICATION OF COG OPERATING LLC
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO CASE NO. 21654

APPLICATION OF COG OPERATING LLC
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO CASE NO. 21655

COG OPERATING LLC'S MOTION FOR CONTINUANCE

COG Operating LLC ("COG"), by and through the undersigned counsel, respectfully requests that the New Mexico Oil Conservation Division ("Division") issue an order continuing these matters to the Division's April 22, 2021 hearing docket. In support of this motion, COG states the following:

1. On January 29, 2021, the Division issued a pre-hearing order setting Case Nos. 21609-21610, 21625-21626, and 21631-21632 for a consolidated hearing on March 18, 2021. As noted in footnote 1 of the pre-hearing order, COG amended its applications in Case Nos. 21625-

21626 by filing Case Nos. 21654-21655, and the parties agree that these new applications should be included in the consolidated hearing in place of COG’s applications in Case Nos. 21625 and 21626.¹ The pre-hearing order also recognized that COG would seek a continuance of the March 18th hearing date.

2. COG requests that the Division issue an order continuing these matters to the Commission’s April 22, 2021 hearing docket. On January 15, 2021, COG was acquired by ConocoPhillips Company, Inc. (“Conoco”), and staffing decisions and assignments are currently under review. Accordingly, additional time is required for Conoco to evaluate how to proceed with respect to these matters and to prepare for the hearing.

3. The requested one-month continuance will not prejudice any party, as it is COG’s understanding that there are no pending lease expiration issues.

4. Counsel for Matador Production Company has been contacted and concurs in the requested continuance. Tap Rock Resources, LLC opposes the motion.

For the foregoing reasons, COG respectfully requests that the Division issue an order continuing these matters to the Division’s April 22, 2021 docket.

Respectfully Submitted,
HINKLE SHANOR LLP

/s/ Dana S. Hardy
Dana S. Hardy
Dioscoro A. Blanco
Hinkle Shanor LLP
P.O. Box 2068
Santa Fe, NM 87504
(505) 982-4554
dhardy@hinklelawfirm.com
dblanco@hinklelawfirm.com

¹ COG’s applications in Case Nos. 21654-21655 are currently set for hearing on the Division’s March 4, 2021 hearing docket.

Ocean Munds-Dry, Esq.
Michael Rodriguez, Esq.
1048 Paseo de Peralta
Santa Fe, NM 87501
(505) 780-8000
omundsdry@concho.com
mrodriguez@concho.com

Counsel for COG Operating, LLC

Certificate of Service

I hereby certify that I caused a true and correct copy of the foregoing Motion for Continuance to be electronically served on the 4th day of February, 2021 on the following counsel of record:

Sharon T. Shaheen
John F. McIntyre
sshaheen@montand.com
jmcintyre@montand.com

Attorneys for Tap Rock Resources, LLC

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

Attorneys for Matador Production Co.

/s/ Dana S. Hardy