

**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 COMPULSORY POOLING, EDDY  
COUNTY, NEW MEXICO.**

**Case No. 21611**

**APPLICATION OF TAP ROCK RESOURCES,  
LLC FOR COMPULSORY POOLING, EDDY  
COUNTY, NEW MEXICO.**

**Case No. 21612**

**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: Dana Arnold

**APPLICANT'S ATTORNEY**

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

**OPPONENT**

EOG Resources, Inc.

Cimarex Energy Co.

**OPPONENT'S ATTORNEY**

Holland & Hart LLP

Modrall Sperling

**STATEMENT OF THE CASE**

**APPLICANT**

**Case No. 21611:** Tap Rock Resources, LLC seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the W/2 of Section 9 and the W/2 of Section 16, Township 25 South, Range 26 East, NMPM, Eddy County, New Mexico. The unit will be dedicated to the following wells:

- (a) the Schlitz Fed. Com. Well No. 202H, with a first take point in the SE/4SW/4 of Section 16 and the last take point in the NE/4NW/4 of Section 9; and
- (b) the Schlitz Fed. Com. Well No. 211H, with a first take point in the SW/4SW/4 of Section 16 and the last take point in the NW/4NW/4 of Section 9.

Case No. 21612: Tap Rock Resources, LLC seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the E/2 of Section 9 and the E/2 of Section 16, Township 25 South, Range 26 East, NMPM, Eddy County, New Mexico. The unit will be dedicated to the following wells:

- (a) the Schlitz Fed. Com. Well No. 204H, with a first take point in the SE/4SE/4 of Section 16 and the last take point in the NE/4NE/4 of Section 9; and
- (b) the Schlitz Fed. Com. Well No. 213H, with a first take point in the SW/4SE/4 of Section 16 and the last take point in the NW/4NE/4 of Section 9.

Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of Tap Rock Operating, LLC as operator of the wells, and a 200% charge for the risk involved in drilling, completing, and equipping the wells.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

| <u>WITNESSES</u>                  | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|-----------------------------------|------------------|-----------------|
| Taylor Ford<br>(landman)          | 10 min.          | Approx. 6       |
| <u>Emily Lange</u><br>(geologist) | 10 min.          | Approx. 6       |

OPPONENT

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|------------------|------------------|-----------------|
|------------------|------------------|-----------------|

**PROCEDURAL MATTERS**

If unopposed these cases will be presented 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 8th day of July, 2021 by e-mail:


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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 35717

**QUESTIONS**

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|--|--|
| Operator:<br>TAP ROCK OPERATING, LLC<br>523 Park Point Drive<br>Golden, CO 80401 | OGRID:<br>372043   |
|  | Action Number:<br>35717                                  |
|  | Action Type:<br>[HEAR] Prehearing Statement (PREHEARING) |

**QUESTIONS**

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|--|----|
| <b>Testimony</b>   |    |
| <i>Please assist us by provide the following information about your testimony.</i> |    |
| Number of witness  | 2  |
| Testimony time (in minutes)  | 20 |