

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

**APPLICATION OF TAP ROCK OPERATING, LLC  
FOR APPROVAL OF SURFACE COMMINGLING AT  
THE WTG TANK BATTERY, EDDY COUNTY, NEW MEXICO.**

**CASE NO. 22293**

**TAP ROCK OPERATING, LLC'S PRE-HEARING STATEMENT**

Tap Rock Operating, LLC (OGRID No. 372043) ("Tap Rock"), the applicant in the above-referenced case, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Tap Rock Operating, LLC

**ATTORNEY**

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**OPPONENT**

Red Bluff Water Control District

**ATTORNEY**

Candace Callahan, Esq.  
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**APPLICANT'S STATEMENT OF CASE**

Tap Rock filed an administrative application with the Division on July 20, 2021, to authorize pool and lease commingling, off-lease storage, off lease measurement, and off-lease marketing at the WTG Tank Battery located in the NW/4 NW/4 (Unit D) of Section 27, Township 26 South, Range 29 East, NMPM, Eddy County, New Mexico. Tap Rock seeks authority to commingle production from the WC-015 G-03 S262925D; Bone Spring Pool (98211); and the Purple Sage; Wolfcamp (Gas) Pool (98220), from *all existing and future wells drilled in the following spacing units:*

(a) The 240-acre, more or less, spacing unit in the WC-015 G-03 S262925D; Bone Spring Pool (98211) underlying the W/2W/2 of Section 27 and the W/2NW/4 of Section 34. The spacing unit is currently dedicated to the **WTG Fed Com #121H well** (API No. 30-015-47855);

(b) The 240-acre, more or less, spacing unit in the WC-015 G-03 S262925D; Bone Spring Pool (98211) underlying the E/2W/2 of Section 27 and the E/2NW/4 of Section 34. The spacing unit is currently dedicated to the **WTG Fed Com #122H well** (API No. 30-015-47033);

(c) The 240-acre, more or less, spacing unit in the WC-015 G-03 S262925D; Bone Spring Pool (98211) underlying the W/2E/2 of Section 27 and the W/2NE/4 of Section 34. The spacing unit is currently dedicated to the **WTG Fed Com #123H well** (API No. 30-015-47041);

(d) The 240-acre, more or less, spacing unit in the WC-015 G-03 S262925D; Bone Spring Pool (98211) underlying the E/2E/2 of Section 27 and E/2NE/4 of Section 34. The spacing unit is currently dedicated to the **WTG Fed Com #124H well** (API No. 30-015-47043);

(e) The 480-acre, more or less, spacing unit in the Purple Sage; Wolfcamp (Gas) Pool (98220) underlying the W/2 of Section 27 and the NW/4 of Section 34. The spacing unit is currently dedicated to the **WTG Fed Com #201H well** (API No. 30-015-46444), the **WTG Fed Com #202H well** (API No. 30-015-47029), the **WTG Fed Com #205H well** (API No. 30-015-46445), the **WTG Fed Com #211H well** (API No. 30-015-46451), the **WTG Fed Com #212H well** (API No. 30-015-47035), the **WTG Fed Com #215H well** (API No. 30-015-46467), the **WTG Fed Com #217H well** (API No. 30-015-47039), the **WTG Fed Com #232H well** (API No. 30-015-48296), the **WTG Fed Com**

#235H well (API No. 30-015-48332), the **WTG Fed Com #241H well** (API No. 30-015-48190), and the **WTG Fed Com #245H well** (API No. 30-015-48186); and

(f) Pursuant to 19.15.12.10.C(4)(g), *future spacing units connected to this central tank battery* with notice provided only to the interest owners within these future spacing units.

Red Bluff Water Control District filed a protest of the administrative application.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Matthew Phillips, Landman	Affidavit	Approx. 8

**PROCEDURAL MATTERS**

Tap Rock requests this case be heard by affidavit.

Respectfully submitted,

**HOLLAND & HART LLP**




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**ATTORNEYS FOR TAP ROCK OPERATING,  
LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2021, I served a copy of the foregoing document to  
all counsel of record via Electronic Mail to:

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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 58492

**QUESTIONS**

Operator: TAP ROCK OPERATING, LLC 523 Park Point Drive Golden, CO 80401	OGRID: 372043
	Action Number: 58492
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>