

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

**APPLICATION OF V-F PETROLEUM, INC.  
LLC FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**Case No: 22287**

**APPLICATION OF V-F PETROLEUM, INC.  
LLC FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**Case No: 22288**

**APPLICATION OF V-F PETROLEUM, INC.  
LLC FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**Case No: 22289**

**PRE-HEARING STATEMENT AND REQUEST FOR SCHEDULING CONFERENCE**

TAP ROCK RESOURCES, LLC (“Tap Rock”) provides this pre-hearing statement as required by the rules of the Division.

**APPEARANCES**

**APPLICANT**

V-F PETROLEUM, INC.

APPLICANT’S ATTORNEYS:

Dana S. Hardy  
Michael Rodriguez  
218 Montezuma  
Santa Fe, NM 87501  
505-982-4554  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[mrodriguez@hinklelawfirm.com](mailto:mrodriguez@hinklelawfirm.com)

**OPPONENT**

TAP ROCK RESOURCES, LLC

TAP ROCK’S ATTORNEYS:

Sharon T. Shaheen  
Ricardo S. Gonzales

Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 986-2678  
[sshaheen@montand.com](mailto:sshaheen@montand.com)  
[rgonzales@montand.com](mailto:rgonzales@montand.com)

### **STATEMENT OF THE CASE**

In these cases, Applicant seeks orders pooling all uncommitted mineral interests within the spacing units as described in the applications in the above-referenced cases. Tap Rock owns an interest in the proposed units and wells. However, there is a cloud on the title of Tap Rock's interest, which Tap Rock is in the process of resolving. Moreover, after title has been cleared, Tap Rock anticipates the possibility of filing competing applications. Tap Rock therefore objects to these cases going forward by affidavit on December 16, 2021 and requests that they be set for a status conference on that date.

### **PROCEDURAL MATTERS**

Tap Rock requests that these matters be heard as a status conference on December 16, 2021.

Respectfully submitted,

**MONTGOMERY & ANDREWS, P.A.**

By: /s/Sharon T. Shaheen

Sharon T. Shaheen  
Ricardo S. Gonzales  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307  
Telephone: (505) 986-2678  
[sshaheen@montand.com](mailto:sshaheen@montand.com)  
[rgonzales@montand.com](mailto:rgonzales@montand.com)

*Attorneys for Tap Rock Resources, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on December 9, 2021 to the following:

Dana S. Hardy  
Michael Rodriguez  
218 Montezuma  
Santa Fe, NM 87501  
505-982-4554  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[mrodriguez@hinklelawfirm.com](mailto:mrodriguez@hinklelawfirm.com)

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 66125

**QUESTIONS**

Operator: V-F PETROLEUM INC P.O. Box 1889 Midland, TX 79702	OGRID: 24010
	Action Number: 66125
	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>