

**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
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
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
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
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 66126

QUESTIONS

Operator: V-F PETROLEUM INC P.O. Box 1889 Midland, TX 79702	OGRID: 24010
	Action Number: 66126
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<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>