

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

**APPLICATIONS OF TAP ROCK  
OPERATING, LLC FOR COMPULSORY  
POOLING, LEA COUNTY, NEW MEXICO.**

**CASE NOS. 22877, 22878**

**CONSOLIDATED PRE-HEARING STATEMENT**

Tap Rock Operating, LLC (“TRO” or “Applicant”), the applicant in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT:**  
Tap Rock Operating, LLC

**ATTORNEYS:**  
Michael Rodriguez  
523 Park Point Drive  
Golden, CO 80401  
(720) 245-2606  
mdrodriguez@taprk.com

**INTERESTED PARTIES:**  
COG Operating LLC &  
Concho Oil & Gas, LLC

**ATTORNEYS:**  
Ocean Munds-Dry  
Elizabeth Ryan  
1048 Paseo de Peralta  
Santa Fe, New Mexico 87501  
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Ocean.Munds-Dry@conocophillips.com  
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**STATEMENT OF THE CASE**

In Case No. 22877, Tap Rock Operating, LLC (“TRO”) applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit (“Unit”) comprised of the W/2W/2 of Section 1 and W/2NW/4 of Section 12, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico. The Unit will be dedicated to the following proposed initial wells (“Wells”) which it intends to drill simultaneously:

The Dingo Federal Com #111H, Dingo Federal Com #115H, and Dingo Federal Com #121H to be horizontally drilled from surface hole locations in the SW/4NW/4 of Section 12 to bottom hole locations in the NW/4NW/4 of Section 1. The completed intervals of the Wells will be orthodox.

In Case No. 22878, Tap Rock Operating, LLC (“TRO”) applies for an order pooling all uncommitted interests within the Wolfcamp formation underlying a 240-acre, more or less, standard horizontal spacing unit (“Unit”) comprised of the W/2W/2 of Section 1 and W/2NW/4 of Section 12, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico. The Unit will be dedicated to the following proposed initial wells (“Wells”) which it intends to drill simultaneously: The Dingo Federal Com #131H and Dingo Federal Com #201H to be horizontally drilled from surface hole locations in the SW/4NW/4 of Section 12 to bottom hole locations in the NW/4NW/4 of Section 1. The completed intervals of the Wells will be orthodox.

Also, to be considered will be the cost of drilling and completing the Wells and the allocation of the cost, the designation of Tap Rock Operating, LLC as operator of the Units and Wells, and a 200% charge for risk involved in drilling and completing the Wells. The Wells are located approximately 16 miles northwest of Jal, New Mexico.

**PROPOSED EVIDENCE**

| <b>WITNESS</b>           | <b>ESTIMATED TIME</b> | <b>ESTIMATED EXHIBITS</b> |
|--------------------------|-----------------------|---------------------------|
| Taylor Ford, Landman     | Via Affidavit         | 7                         |
| Eli DenBesten, Geologist | Via Affidavit         | 4                         |

**PROCEDURAL MATTERS**

TRO requests the subject cases be consolidated. TRO intends to present the subject cases by affidavit if there is no opposition to its applications.

Respectfully submitted,

TAP ROCK OPERATING, LLC

/s/ Michael Rodriguez

Michael Rodriguez  
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(720) 245-2606  
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*Attorney for Tap Rock Operating, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2022, I caused a true and correct copy of this document to be electronically served on the following:

Ocean Munds-Dry  
Elizabeth Ryan  
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/s/ Michael Rodriguez

Michael Rodriguez

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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 125570

**QUESTIONS**

|  |  |
|--|--|
| Operator:<br>TAP ROCK OPERATING, LLC<br>523 Park Point Drive<br>Golden, CO 80401 | OGRID:<br>372043   |
|  | Action Number:<br>125570                                 |
|  | Action Type:<br>[HEAR] Prehearing Statement (PREHEARING) |

**QUESTIONS**

|  |   |
|--|---|
| <b>Testimony</b>   |   |
| <i>Please assist us by provide the following information about your testimony.</i> |   |
| Number of witnesses  | 2 |
| Testimony time (in minutes)  | 0 |