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

INTERESTED PARTIES:

COG Operating LLC &

Concho Oil & Gas, LLC

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

ATTORNEYS:

Ocean Munds-Dry Elizabeth Ryan 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000 Ocean.Munds-Dry@conocophillips.com Beth.Ryan@conocophillips.com

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

	ESTIMATED	ESTIMATED
WITNESS	TIME	EXHIBITS
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 523 Park Point Drive Golden, CO 80401 (720) 245-2606 mdrodriguez@taprk.com *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 Ocean.Munds-Dry@conocophillips.com Beth.Ryan@conocophillips.com

> <u>/s/ Michael Rodriguez</u> Michael Rodriguez

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

Operator:	OGRID:	
TAP ROCK OPERATING, LLC	372043	
	Action Number:	
Golden, CO 80401	125578	
	Action Type:	
	[HEAR] Prehearing Statement (PREHEARING)	
QUESTIONS		
Testimony		

Please assist us by provide the following information about your testimony.		
Number of witnesses	2	
Testimony time (in minutes)	0	

Page 4 of 4