

**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. 22929-22932

CONSOLIDATED PRE-HEARING STATEMENT

Tap Rock Operating, LLC (“TRO” or “Applicant”), the applicant in the above referenced matters, 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:

EOG Resources, Inc.
(Case Nos. 22929, 22932 only)

ATTORNEYS:

James P. Parrot
Beatty & Wozniak, P.C.
1675 Broadway, Suite 600
Denver, CO 80202
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STATEMENT OF THE CASE

In **Case No. 22929**, Tap Rock Operating, LLC (“TRO”) applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 640-acre, more or less, standard horizontal spacing unit (“Unit”) comprised of the S/2 of Sections 13 and 14, Township 25 South, Range 25 East, NMPM, Eddy County, New Mexico. The Unit will be dedicated to the following proposed initial wells (“Wells”) which it intends to drill simultaneously:

- Cold Snack Federal Com #153H to be horizontally drilled from a surface hole location in the NW/4SW/4 of Section 14 to a bottom hole location in the NE/4SE/4 of Section 13,
- Cold Snack Federal Com #154H to be horizontally drilled from a surface hole location in the NW/4SW/4 of Section 14 to a bottom hole location in the SE/4SE/4 of Section 13.

The completed interval for the Cold Snack Federal Com #153H will be within 330' of the quarter-quarter line separating the N/2S/2 from the S/2S/2 of Sections 13 and 14 to allow the inclusion of this acreage into a standard horizontal spacing unit.

In **Case No. 22930**, Tap Rock Operating, LLC ("TRO") applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 640-acre, more or less, standard horizontal spacing unit ("Unit") comprised of the N/2 of Sections 13 and 14, Township 25 South, Range 25 East, NMPM, Eddy County, New Mexico. The Unit will be dedicated to the following proposed initial wells ("Wells") which it intends to drill simultaneously:

- Cold Snack Federal Com #151H to be horizontally drilled from a surface hole location in the SW/4NW/4 of Section 14 to a bottom hole location in the NE/4NE/4 of Section 13, and
- Cold Snack Federal Com #152H to be horizontally drilled from a surface hole location in the SW/4NW/4 of Section 14 to a bottom hole location in the SE/4NE/4 of Section 13.

The completed interval for the Cold Snack Federal Com #152H will be within 330' of the quarter-quarter line separating the N/2N/2 from the S/2N/2 of Sections 13 and 14 to allow the inclusion of this acreage into a standard horizontal spacing unit.

In **Case No. 22931**, Tap Rock Operating, LLC ("TRO") applies for an order pooling all uncommitted interests within the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit ("Unit") comprised of the N/2 of Sections 13 and 14, Township 25 South, Range 25 East, NMPM, Eddy County, New Mexico. The Unit will be dedicated to the following proposed initial wells ("Wells") which it intends to drill simultaneously:

- Cold Snack Federal Com #211H and Cold Snack Federal Com #231H to be horizontally drilled from a surface hole location in the SW/4NW/4 of Section 14 to a bottom hole location in the NE/4NE/4 of Section 13,
- Cold Snack Federal Com #212H and Cold Snack Federal Com #232H to be horizontally drilled from a surface hole location in the SW/4NW/4 of Section 14 to a bottom hole location in the SE/4NE/4 of Section 13.

In **Case No. 22932**, Tap Rock Operating, LLC (“TRO”) applies for an order pooling all uncommitted interests within the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit (“Unit”) comprised of the S/2 of Sections 13 and 14, Township 25 South, Range 25 East, NMPM, Eddy County, New Mexico. The Unit will be dedicated to the following proposed initial wells (“Wells”) which it intends to drill simultaneously:

- Cold Snack Federal Com #214H and Cold Snack Federal Com #234H to be horizontally drilled from a surface hole location in the NW/4SW/4 of Section 14 to a bottom hole location in the SE/4SE/4 of Section 13,
- Cold Snack Federal Com #213H and Cold Snack Federal Com #233H to be horizontally drilled from a surface hole location in the NW/4SW/4 of Section 14 to a bottom hole location in the NE/4SE/4 of Section 13.

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 Units are located approximately 3.1 miles south of Whites City, New Mexico.

PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	ESTIMATED EXHIBITS
Matthew Phillips, Land Manager	Via Affidavit	7
Eli DenBesten, Geologist	Via Affidavit	6

PROCEDURAL MATTERS

Applicant requests the subject cases be consolidated. Applicant will 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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 Golden, CO 80401
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 Attorney for Tap Rock Operating, LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2022, I caused a true and correct copy of this document to be electronically served on the following:

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/s/ 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 129453

QUESTIONS

Operator: TAP ROCK OPERATING, LLC 523 Park Point Drive Golden, CO 80401	OGRID: 372043
	Action Number: 129453
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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