

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

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

**CASE NOS. 23258 - 23263**

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

**CASE NOS. 23105 & 23106**

**COG OPERATING LLC'S UNOPPOSED MOTION FOR  
CONSOLIDATION AND FOR ISSUANCE OF AMENDED PRE-HEARING ORDER**

COG Operating LLC ("COG") requests that the Oil Conservation Division ("Division"):  
(1) consolidate Case Nos. 23258-23263 with Case Nos. 23105 and 23106 for hearing; and (2) issue  
an amended Pre-Hearing Order that sets the cases for a contested hearing on March 16, 2023. In  
support of this motion, COG states the following:

1. COG's Case Nos. 23258-23263 involve competing proposals with Tap Rock Operating, LLC's ("Tap Rock") Case Nos. 23105 & 23106.
2. Tap Rock's cases are currently set for a contested hearing on January 19, 2023 under an Amended Pre-Hearing Order that was issued on November 7, 2022. COG's cases are set for hearing on January 5, 2023.
3. COG and Tap Rock agree that these cases should be consolidated for hearing.
4. COG and Tap Rock have also agreed that it would be beneficial for the parties to have additional time to reach an agreement. As a result, COG requests that the Division issue an amended pre-hearing order that sets the competing applications for hearing on March 16, 2023.
5. No party opposes this request.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. McLean

Yarithza Peña

Post Office Box 2068

Santa Fe, NM 87504-2068

(505) 982-4554 (phone)

(505) 982-8623 (fax)

[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)

[jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com)

[ypena@hinklelawfirm.com](mailto:ypena@hinklelawfirm.com)

*Counsel for COG Operating LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 16, 2022, I caused a true and correct copy of the foregoing motion to be electronically served on the following counsel of record:

Michael Rodriguez  
TAP ROCK OPERATING, LLC  
523 Park Point Drive  
Golden, CO 80401  
(720) 2245-2606  
[mrodriguez@taprk.com](mailto:mrodriguez@taprk.com)  
*Attorney for Tap Rock Operating, LLC*

/s/ Dana S. Hardy

Dana S. Hardy