

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

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

**Case No. 21568  
Case No. 21572  
Case No. 22653**

**APPLICATION OF CHEVRON U.S.A.  
INC. FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**Case No. 22409  
Case No. 22410  
Case No. 22411  
Case No. 22412**

**JOINT MOTION FOR CONTINUANCE  
AND TO VACATE THE PREHEARING ORDER**

Applicant in case numbers 22409, 22410, 22411 and 22412, Chevron U.S.A. Inc. (“Chevron”) and Applicant in case numbers 21568, 21572 and 22653, Tap Rock Resources, LLC (“Tap Rock”), jointly request that: (1) the Amended Prehearing Order entered October 17, 2022 be vacated; and (2) the hearing set for February 16, 2023 for the competing cases filed by Chevron and Tap Rock be set for a Status Conference.

As grounds therefore, the parties state that they are continuing to negotiate over the resolution of these cases and need additional time for such negotiations and all parties that have entered an appearance do not oppose the granting of this motion.

Upon the granting of this motion, the applicant for each case will file continuances for their respective cases in the Division’s portal.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.

By: /s/ Earl E. DeBrine, Jr.

Earl E. DeBrine, Jr. ([edebrine@modrall.com](mailto:edebrine@modrall.com))

Deana M. Bennett ([dbennett@modrall.com](mailto:dbennett@modrall.com))

Jamie Allen ([jallen@modrall.com](mailto:jallen@modrall.com))

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

*Attorneys for Chevron U.S.A. Inc.*

and

James Bruce

Attorney at Law

P.O. Box 1056

Santa Fe, New Mexico 87504

[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

*Attorney for Tap Rock Resources, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on the following counsel by electronic mail on February 7th, 2023:

James Bruce  
Attorney at Law  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)  
*Attorney for Tap Rock Resources, LLC*

Ocean Munds-Dry  
Beth Ryan  
CONOCOPHILLIPS  
1048 Paseo de Peralta  
Santa Fe, NM 87501  
[Ocean.Munds-Dry@ConocoPhillips.com](mailto:Ocean.Munds-Dry@ConocoPhillips.com)  
[Beth.Ryan@ConocoPhillips.com](mailto:Beth.Ryan@ConocoPhillips.com)

Darin C. Savage  
William E. Zimsky  
Andrew D. Schill  
ABADIE SCHILL  
214 McKenzie Street  
Santa Fe, NM 87501  
[darin@abadieschill.com](mailto:darin@abadieschill.com)  
[andrew@abadieschill.com](mailto:andrew@abadieschill.com)  
[bill@abadieschill.com](mailto:bill@abadieschill.com)  
*Attorneys for Coterra Energy Inc.*

Joby Rittenhouse  
CONOCOPHILLIPS  
600 W. Illinois Ave.  
Midland, TX 79701  
[Joby.Rittenhouse@ConocoPhillips.com](mailto:Joby.Rittenhouse@ConocoPhillips.com)  
*Attorneys for COG Operating LLC*

MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.

By: /s/ Earl E. DeBrine, Jr.  
Earl E. DeBrine, Jr.

W4644537.DOCX