

**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)

Deana M. Bennett (dbennett@modrall.com)

Jamie Allen (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

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
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
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
andrew@abadieschill.com
bill@abadieschill.com
Attorneys for Coterra Energy Inc.

Joby Rittenhouse
CONOCOPHILLIPS
600 W. Illinois Ave.
Midland, TX 79701
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