

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

**APPLICATION OF TAP ROCK  
OPERATING, LLC FOR APPROVAL OF  
STANDARD HORIZONTAL SPACING  
UNIT AND COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

**CASE NO. \_\_\_\_\_**

**APPLICATION**

Tap Rock Operating, LLC, OGRID No. 372043 (“Tap Rock” or “Applicant”), through its undersigned attorneys, hereby files this Application with the Oil Conservation Division (“Division”) pursuant to the provisions of NMSA 1978, § 70-2-17, for an order (1) approving a 320-acre, more or less, standard horizontal spacing unit (“HSU”) composed of the S/2 N/2 of Sections 9 and 10, Township 25 South, Range 25 East, N.M.P.M., Eddy County, New Mexico (the “Application Lands”), and (2) pooling all uncommitted mineral interests in the Cottonwood Draw; Bone Spring Pool [97494], designated as an oil pool, underlying said HSU.

In support of its Application, Tap Rock states the following:

1. Tap Rock and/or its affiliates are working interest owners in the Application Lands and have the right to drill a well thereon as the designated Operator of the Application Lands.
2. Tap Rock seeks to dedicate all of the Application Lands to form a 320-acre, more or less, HSU.
3. Tap Rock seeks to dedicate the above-referenced HSU to the following proposed well:
  - A. **Upslope Fed Com 152H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 11, Township 25 South, Range 25 East, to a bottom hole location in the Cottonwood Draw;

Bone Spring Pool in the SW/4 NW/4 (Unit E) of Section 9, Township 25 South, Range 25 East.

4. The well is orthodox in its location as defined by 19.15.16.15.C. NMAC, and the take points and lateral comply with Statewide Rules for setbacks under 19.15.16.15.C.(1)(a-b) NMAC.

5. Tap Rock has made good faith efforts to obtain voluntary agreement from all interest owners in the Cottonwood Draw; Bone Spring Pool underlying the proposed spacing unit, but has been unable to secure agreement from all parties to participate in the drilling of the well or otherwise commit their interests.

6. The pooling of all interests in the Cottonwood Draw; Bone Spring Pool within the proposed unit will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

7. To provide for its just and fair share of oil and gas underlying the Application Lands, Tap Rock requests that all uncommitted interests in this HSU be pooled and that Tap Rock be designated as the operator of the proposed horizontal well and HSU.

WHEREFORE, Tap Rock requests this Application be set for hearing on January 8, 2026, before an Examiner of the Oil Conservation Division, and after notice and hearing as required by law, the Division enter an order:

- A. Approving the horizontal well spacing unit and pooling all uncommitted interests in Cottonwood Draw; Bone Spring Pool underlying the HSU within the Application Lands;
- B. Approving the **Upslope Fed Com 152H** as the initial well for the HSU;

- C. Designating Tap Rock as operator of the HSU and the horizontal well to be drilled thereon;
- D. Authorizing Tap Rock to recover its costs of drilling, completing, and equipping the well;
- E. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% charge for the risk assumed by Tap Rock in drilling, equipping, and completing the well against any working interest owner who does not voluntarily participate in the drilling of the well.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: 

Miguel A. Suazo

James P. Parrot

Jacob L. Everhart

Ryan McKee

500 Don Gaspar Ave.,

Santa Fe, NM 87505

(505) 946-2090

[msuazo@bwenergylaw.com](mailto:msuazo@bwenergylaw.com)

[jparrot@bwenergylaw.com](mailto:jparrot@bwenergylaw.com)

[jeverhart@bwenergylaw.com](mailto:jeverhart@bwenergylaw.com)

[rmckee@bwenergylaw.com](mailto:rmckee@bwenergylaw.com)

*Attorneys for Tap Rock Operating LLC*

***Application of Tap Rock Operating, LLC for Approving a Standard Horizontal Spacing Unit and Compulsory Pooling, Eddy County, New Mexico.*** Applicant in the above-styled cause seeks an order from the Division: (1) approving a 320-acre, more or less, standard horizontal spacing and proration unit composed of the S/2 N/2 of Sections 9 and 10, Township 25 South, Range 25 East, N.M.P.M, Eddy County, New Mexico, and (2) pooling all uncommitted mineral interests in the Cottonwood Draw; Bone Spring Pool, designated as an oil pool, underlying said unit. The proposed well to be dedicated to the horizontal spacing unit is the **Upslope Fed Com 152H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 11, Township 25 South, Range 25 East, to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 9, Township 25 South, Range 25 East. The well is orthodox in location, and the take points and lateral comply with Statewide Rules for setbacks. The well and lands are located approximately 2.32 miles south of Whites City, New Mexico.