

**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 Nos. 21940 and 21949 - 21951

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Tap Rock Resources, LLC as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Tap Rock Resources, LLC

Attention: Dana Arnold

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

COG Operating LLC

OPPONENT'S ATTORNEY

Michael Rodriguez

STATEMENT OF THE CASE

APPLICANT

Case No. 21940: Tap Rock Resources, LLC seeks an order pooling all mineral interest owners in the Wolfbone formation underlying a horizontal spacing unit comprised of the E/2W/2 of Section 34, Township 24 South, Range 35 East, NMPM, and the E/2NW/4 of Section 3, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico. The unit will be dedicated to the Mulva Fed. Com. Well Nos. 132H, 212H, and 217H, which have first take points in the NE/4NW/4 of Section 34 and last take points in the SE/4NW/4 of Section 3.

Case No. 21949: Tap Rock Resources, LLC seeks an order pooling all mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the E/2W/2 of Section 34, Township 24 South, Range 35 East, NMPM, and the E/2NW/4 of Section 3, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico. The unit will be dedicated to the Mulva Fed. Com. Well No. 112H, which has a first take point in the NE/4NW/4 of Section 34 and a last take point in the SE/4NW/4 of Section 3.

Case No. 21950: Tap Rock Resources, LLC seeks an order pooling all mineral interest owners in the Wolfbone formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 34, Township 24 South, Range 35 East, NMPM, and the W/2NW/4 of Section 3, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico. The unit will be

dedicated to the Mulva Fed. Com. Well Nos. 131H, 211H, and 215H, which have first take points in the NW/4NW/4 of Section 34 and last take points in the SW/4NW/4 of Section 3.

Case No. 21951: Tap Rock Resources, LLC seeks an order pooling all mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 34, Township 24 South, Range 35 East, NMPM, and the W/2NW/4 of Section 3, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico. The unit will be dedicated to the Mulva Fed. Com. Well No. 111H, which has a first take point in the NW/4NW/4 of Section 34 and a last take point in the SW/4NW/4 of Section 3.

Also to be considered in each case will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of Tap Rock Operating, LLC as operator of the wells, and a 200% charge for the risk involved in drilling, completing, and equipping the wells.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

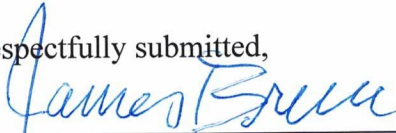
<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Taylor Ford (landman)	15 min.	Approx. 10
Emily Lange (geologist)	15 min.	Approx. 6

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

If the cases are unopposed they will be submitted by affidavit.

Respectfully submitted,


 James Bruce
 Post Office Box 1056
 Santa Fe, New Mexico 87504
 (505) 982-2043

Attorney for Tap Rock Resources, LLC