

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

IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:

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

Case Nos. 21422 & 21423

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT  
COG Operating LLC

APPLICANT'S ATTORNEY  
Ocean Munds-Dry  
Beth Ryan

OPPONENT  
Tap Rock Resources, LLC

Attention: Dana Arnold

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

STATEMENT OF THE CASE

APPLICANT

Applicant seeks to force pool the Wolfcamp formation in Sections 23, 26, and 35, Township 26 South, Range 28 East, NMPM, for its proposed Keg Shell wells.

OPPONENT

*Tap Rock has a counter application in Case No. 20676, which is also set on June 17th. It is nearing settlement of its differences with Applicant, and will be filing a motion to continue Case No. 20676. Tap Rock is filing this pleading to preserve its rights.*

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Matt Phillips  
(landman)

20 min.

Approx. 8

Emily Lange  
(geologist)

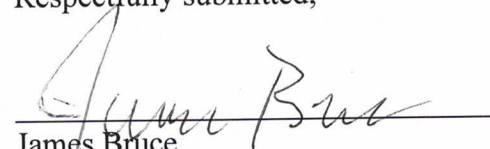
20 min.

Approx. 8

**PROCEDURAL MATTERS**

Tap Rock objects to this case being submitted by affidavit.

Respectfully submitted,



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

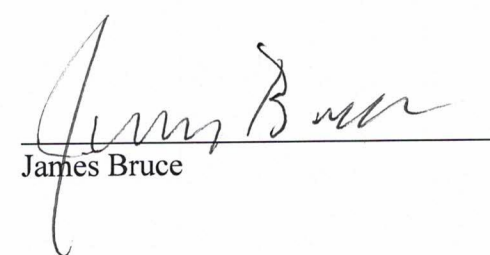
Attorney for Tap Rock Resources, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 10<sup>th</sup> day of June, 2021 by e-mail:

Ocean Munds-Dry  
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Elizabeth Ryan  
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James Bruce