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

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

CASE NOS. 21568, 21572, 21771

UNOPPOSED MOTION FOR CONTINUANCE AND TO VACATE THE DECEMBER 16, 2021 HEARING, AND TO VACATE THE PRE-HEARING ORDER AND DEADLINES

Chevron U.S.A., Inc. ("Chevron") submits this unopposed motion to (1) continue Tap Rock Resources, LLC cases 21568, 21572, 21771 to January 20, 2022; (2) vacate the contested hearing currently set for the December 6, 2021; (3) vacate the Pre-hearing order and deadlines; and (4) set these cases for a contested haring on January 20, 2022.

1. The above-referenced cases are set for hearing on December 16, 2021 pursuant to the Pre-Hearing Order issued on September 23, 2021.

Chevron intends to file applications which compete with Tap Rock cases 21568,
21572, 21771 the first week of December following the expiration of the election deadline in Chevron's proposals.

3. Chevron's applications should be heard in conjunction with and be consolidated with Tap Rock's cases.

4. Chevron will notify the Division and the parties when it files its competing applications so that the competing applications can be consolidated with the Tap Rock cases and combined in a single pre-hearing order.

5. Tap Rock, the only other party of record, does not oppose this request.

For the foregoing reasons Chevron respectfully requests the Division (1) continue Tap Rock cases 21568, 21572, 21771 to January 20, 2022; (2) vacate the contested hearing currently

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set for the December 6, 2021; (3) vacate the Pre-hearing order and deadlines, and (4) set these

cases, along with the to-be-filed Chevron cases, for a contested having on January 20, 2022.

Respectfully submitted,

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

By:/s/ Deana M. Bennett Earl E. DeBrine, Jr. Deana M. Bennett Jamie L. Allen Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 edebrine@modrall.com dbennett@modrall.com jla@modrall.com Attorneys for Chevron U.S.A., Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following

counsel of record by electronic mail on November 11, 2021:

James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043 jamesbruc@aol.com Attorneys for Tap Rock Resources Company

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

By: <u>/s/ Deana M. Bennett</u> Deana M. Bennett