

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

**APPLICATIONS OF TAP ROCK  
OPERATING, LLC FOR COMPULSORY  
POOLING, LEA COUNTY, NEW MEXICO.**

**CASE NOS. 22929-22932**

**CONSOLIDATED PRE-HEARING STATEMENT**

Tap Rock Operating, LLC (“TRO” or “Applicant”), the applicant in the above referenced matters, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT:**

Tap Rock Operating, LLC

**ATTORNEYS:**

Michael Rodriguez  
523 Park Point Drive  
Golden, CO 80401  
(720) 245-2606  
mdrodriguez@taprk.com

**INTERESTED PARTIES:**

EOG Resources, Inc.  
(Case Nos. 22929, 22932 only)

**ATTORNEYS:**

James P. Parrot  
Beatty & Wozniak, P.C.  
1675 Broadway, Suite 600  
Denver, CO 80202  
jparrot@bwenergyllaw.com

**STATEMENT OF THE CASE**

In **Case No. 22929**, Tap Rock Operating, LLC (“TRO”) applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 640-acre, more or less, standard horizontal spacing unit (“Unit”) comprised of the S/2 of Sections 13 and 14, Township 25 South, Range 25 East, NMPM, Eddy County, New Mexico. The Unit will be dedicated to the following proposed initial wells (“Wells”) which it intends to drill simultaneously:

- Cold Snack Federal Com #153H to be horizontally drilled from a surface hole location in the NW/4SW/4 of Section 14 to a bottom hole location in the NE/4SE/4 of Section 13,
- Cold Snack Federal Com #154H to be horizontally drilled from a surface hole location in the NW/4SW/4 of Section 14 to a bottom hole location in the SE/4SE/4 of Section 13.

The completed interval for the Cold Snack Federal Com #153H will be within 330' of the quarter-quarter line separating the N/2S/2 from the S/2S/2 of Sections 13 and 14 to allow the inclusion of this acreage into a standard horizontal spacing unit.

In **Case No. 22930**, Tap Rock Operating, LLC ("TRO") applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 640-acre, more or less, standard horizontal spacing unit ("Unit") comprised of the N/2 of Sections 13 and 14, Township 25 South, Range 25 East, NMPM, Eddy County, New Mexico. The Unit will be dedicated to the following proposed initial wells ("Wells") which it intends to drill simultaneously:

- Cold Snack Federal Com #151H to be horizontally drilled from a surface hole location in the SW/4NW/4 of Section 14 to a bottom hole location in the NE/4NE/4 of Section 13, and
- Cold Snack Federal Com #152H to be horizontally drilled from a surface hole location in the SW/4NW/4 of Section 14 to a bottom hole location in the SE/4NE/4 of Section 13.

The completed interval for the Cold Snack Federal Com #152H will be within 330' of the quarter-quarter line separating the N/2N/2 from the S/2N/2 of Sections 13 and 14 to allow the inclusion of this acreage into a standard horizontal spacing unit.

In **Case No. 22931**, Tap Rock Operating, LLC ("TRO") applies for an order pooling all uncommitted interests within the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit ("Unit") comprised of the N/2 of Sections 13 and 14, Township 25 South, Range 25 East, NMPM, Eddy County, New Mexico. The Unit will be dedicated to the following proposed initial wells ("Wells") which it intends to drill simultaneously:

- Cold Snack Federal Com #211H and Cold Snack Federal Com #231H to be horizontally drilled from a surface hole location in the SW/4NW/4 of Section 14 to a bottom hole location in the NE/4NE/4 of Section 13,
- Cold Snack Federal Com #212H and Cold Snack Federal Com #232H to be horizontally drilled from a surface hole location in the SW/4NW/4 of Section 14 to a bottom hole location in the SE/4NE/4 of Section 13.

In **Case No. 22932**, Tap Rock Operating, LLC (“TRO”) applies for an order pooling all uncommitted interests within the Wolfcamp formation underlying a 640-acre, more or less, standard horizontal spacing unit (“Unit”) comprised of the S/2 of Sections 13 and 14, Township 25 South, Range 25 East, NMPM, Eddy County, New Mexico. The Unit will be dedicated to the following proposed initial wells (“Wells”) which it intends to drill simultaneously:

- Cold Snack Federal Com #214H and Cold Snack Federal Com #234H to be horizontally drilled from a surface hole location in the NW/4SW/4 of Section 14 to a bottom hole location in the SE/4SE/4 of Section 13,
- Cold Snack Federal Com #213H and Cold Snack Federal Com #233H to be horizontally drilled from a surface hole location in the NW/4SW/4 of Section 14 to a bottom hole location in the NE/4SE/4 of Section 13.

Also, to be considered will be the cost of drilling and completing the Wells and the allocation of the cost, the designation of Tap Rock Operating, LLC as operator of the Units and Wells, and a 200% charge for risk involved in drilling and completing the Wells. The Units are located approximately 3.1 miles south of Whites City, New Mexico.

**PROPOSED EVIDENCE**

<b>WITNESS</b>	<b>ESTIMATED TIME</b>	<b>ESTIMATED EXHIBITS</b>
Matthew Phillips, Land Manager	Via Affidavit	7
Eli DenBesten, Geologist	Via Affidavit	6

**PROCEDURAL MATTERS**

Applicant requests the subject cases be consolidated. Applicant will present the subject cases by affidavit if there is no opposition to its applications.

Respectfully submitted,

TAP ROCK OPERATING, LLC

*/s/ Michael Rodriguez*

---

Michael Rodriguez  
523 Park Point Drive  
Golden, CO 80401  
(720) 245-2606  
mdrodriguez@taprk.com  
Attorney for Tap Rock Operating, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on July 28, 2022, I caused a true and correct copy of this document to be electronically served on the following:

James P. Parrot  
Beatty & Wozniak, P.C.  
1675 Broadway, Suite 600  
Denver, CO 80202  
jparrot@bwenergylaw.com

/s/ Michael Rodriguez

Michael Rodriguez

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 129450

**QUESTIONS**

Operator: TAP ROCK OPERATING, LLC 523 Park Point Drive Golden, CO 80401	OGRID: 372043
	Action Number: 129450
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	2
Testimony time (in minutes)	0