

**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. 22933, 22934

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.

ATTORNEYS:
Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

STATEMENT OF THE CASE

In **Case No. 22933**, 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 E/2 of Sections 11 and 14, Township 20 South,

Range 32 East, NMPM, Lea County, New Mexico. The Unit will be dedicated to the following proposed initial wells (“Wells”) which it intends to drill simultaneously:

- Double Stamp Fed Com #113H, #123H, #126H, #133H, #153H and #173H to be horizontally drilled from a surface hole location in the SW/4SE/4 of Section 14 to a bottom hole location in the NW/4NE/4 of Section 11, and
- Double Stamp Fed Com #114H, #116H, #124H, #128H, #134H, #136H, #154H and #174H to be horizontally drilled from a surface hole location in the SW/4SE/4 of Section 14 to a bottom hole location in the NE/4NE/4 of Section 11.

The completed interval for the Double Stamp Fed Com #116H will be within 330’ of the quarter-quarter line separating the W/2E/2 from the E/2E/2 of Sections 11 and 14 to allow the inclusion of this acreage into a standard horizontal spacing unit.

In **Case No. 22934**, 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 W/2 of Sections 11 and 14, Township 20 South, Range 32 East, NMPM, Lea County, New Mexico. The Unit will be dedicated to the following proposed initial wells (“Wells”) which it intends to drill simultaneously:

- Double Stamp Fed Com #111H, Double Stamp Fed Com #115H, Double Stamp Fed Com #121H, Double Stamp Fed Com #125H, Double Stamp Fed Com #131H, Double Stamp Fed Com #135H, Double Stamp Fed Com #151H, and Double Stamp Fed Com #171H to be horizontally drilled from a surface hole location in the SE/4SW/4 of Section 14 to a bottom hole location in the NW/4NW/4 of Section 11, and
- Double Stamp Fed Com #112H, Double Stamp Fed Com #122H, Double Stamp Fed Com #127H, Double Stamp Fed Com #132H, Double Stamp Fed Com #152H, and Double Stamp Fed Com #172H to be horizontally drilled from a surface hole location in the SE/4SW/4 of Section 14 to a bottom hole location in the NE/4NW/4 of Section 11.

The completed interval for the Double Stamp Fed Com #115H will be within 330’ of the quarter-quarter line separating the W/2W/2 from the E/2W/2 of Sections 11 and 14 to allow the inclusion of this acreage into a standard horizontal spacing unit.

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 Unit and Wells, and a 200% charge for risk involved in drilling and completing the Wells. The Units are located approximately 35 miles southwest of Hobbs, New Mexico.

PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	ESTIMATED EXHIBITS
Erica Shewmaker, Landman	Via Affidavit	7
Eli DenBesten, Geologist	Via Affidavit	4

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 November 10, 2022, I caused a true and correct copy of this document to be electronically served on the following:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.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 157704

QUESTIONS

Operator: TAP ROCK OPERATING, LLC 523 Park Point Drive Golden, CO 80401	OGRID: 372043
	Action Number: 157704
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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