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

APPLICATION OF TASCOSA ENERGY PARTNERS, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NOS. 23435

PRE-HEARING STATEMENT

Tascosa Energy Partners, LLC ("Tascosa" or "Applicant") submits its Pre-Hearing

Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

Tascosa Energy Partners, LLC

ATTORNEYS

Dana S. Hardy Jaclyn M. McLean Yarithza Peña Hinkle Shanor LLP P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com ypena@hinklelawfirm.com

INTERESTED PARTIES

Fasken Oil & Ranch, Ltd.

ATTORNEYS

Michael H. Felderwert Adam G. Rankin Julia Broggi Paula M. Vance Post Office Box 2208

Santa Fe, New Mexico 87504

Phone: (505) 988-4421

mfelderwert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com pmvance@hollandhart.com

COG Operating LLC

Ocean Munds-Dry Elizabeth Ryan Jobediah Rittenhouse ConocoPhillips 1048 Paseo de Peralta

Santa Fe, New Mexico 87501

(505) 780-8000 ocean.munds-dry@conocophillips.com beth.ryan@conocophillips.com joby.rittenhouse@conocophillips.com

STATEMENT OF THE CASE

Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 640-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Sections 32 and 33, Township 20 South, Range 27 East, Eddy County, New Mexico ("Unit"). The Unit will be dedicated to the following wells ("Wells"):

- Ventura 3233 Fed Com #301H well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 32, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 33;
- Ventura 3233 Fed Com #201H well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 32, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 33;
- Ventura 3233 Fed Com #602H well, to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 32, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 33;
- Ventura 3233 Fed Com #202H well, to be drilled from a surface hole location in the SW/4 NW/4 (Unit E) of Section 32, to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 33; and
- Ventura 3233 Fed Com #303H well to be drilled from a surface hole location in the SW/4 NW/4 (Unit E) of Section 32, to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 33.

The completed intervals of the Wells will be orthodox. The completed interval of the Ventura 3233 Fed Com #602H well will be located within 330' of the quarter-quarter section line separating the N/2 N/2 and S/2 N/2 of Sections 32 and 33, Township 20 South, Range 27 East, to allow for the creation of a 640-acre standard horizontal spacing unit.

Also to be considered in each case will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The Wells are located approximately 7 miles north-northwest of Carlsbad, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
John Shoberg	Landman	Affidavit	Approx. 5
Helder Alvarez	Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Applicant will present this case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. McLean

Yarithza Peña

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

ypena@hinklelawfirm.com

Counsel for Tascosa Energy Partners, LLC

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2023, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Michael H. Felderwert
Adam G. Rankin
Julia Broggi
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
Phone: (505) 988-4421
mfelderwert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com
Attorneys for Fasken Oil & Ranch, Ltd.

Ocean Munds-Dry
Elizabeth Ryan
Jobediah Rittenhouse
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
ocean.munds-dry@conocophillips.com
beth.ryan@conocophillips.com
joby.rittenhouse@conocophillips.com
Attorneys for COG Operating LLC

/s/ Dana S. Hardy
Dana S. Hardy

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

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 211508

QUESTIONS

Operator:	OGRID:
Tascosa Energy Partners, L.L.C	329748
901 W. Missouri Ave	Action Number:
Midland, TX 79701	211508
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	