

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

**APPLICATIONS OF TAP ROCK  
OPERATING, LLC FOR APPROVAL  
OF STANDARD HORIZONTAL SPACING  
UNIT AND COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NOS. 25886–25887**

**COG OPERATING, LLC’S UNOPPOSED MOTION  
TO AMEND PRE-HEARING ORDER**

COG Operating LLC (“COG”), by and through its undersigned counsel, respectfully moves the Oil Conservation Division (“Division”) to amend the Pre-Hearing Order entered in the above-captioned Tap Rock Operating, LLC (“Tap Rock”) cases. In support of this request, COG states the following.

1. COG, a wholly owned subsidiary of ConocoPhillips Company, entered its appearance and objected to the above referenced cases on January 23, 2026.
2. During a status conference held on February 26, 2026, the Division set the Tap Rock cases for a contested hearing beginning on May 12, 2026, with the possibility of continuing to May 13, 2026.
3. Also at the status conference, COG notified the Division that it intends to file competing applications, which will be consolidated with Tap Rock’s applications for the contested hearing.
4. Because the hearing will involve competing development plans and multiple witnesses for each side, it is unlikely to conclude in one day. *See* Self-Affirmed Statement of Shelley C. Klingler, attached as **Exhibit A**.
5. The Division subsequently notified the parties that the contested hearing would begin on May 13, 2026 and would continue on May 19, 2026 if necessary.

6. Shelley C. Klingler, a New Mexico Land Advisor with ConocoPhillips Company and the land witness for COG, is unavailable to testify from May 14 to May 20, 2026, due to pre-planned, non-refundable travel. *See Exhibit A.*

7. As a result, if the hearing begins on May 13, 2026, and does not conclude that day, which is likely, the hearing will need to be continued to a date after May 25, 2026. This delay would preclude the parties from presenting testimony in an orderly and uninterrupted manner, resulting in disruption to the presentation of evidence and potential prejudice.

8. The Oil Conservation Division offered May 27, 2026, as an alternative hearing date, and the parties have conferred and agree that starting the contested hearing on May 27, 2026, with the possibility of continuing to May 28, 2026, would best accommodate witness availability and promote the efficient and fair adjudication of these consolidated cases.

9. Good cause therefore exists to amend the Pre-Hearing Order to reset the contested hearing date for May 27, 2026 and conform related deadlines accordingly.

10. Tap Rock concurs in this motion.

WHEREFORE, COG respectfully requests that the Division amend the Pre-Hearing Order as outlined herein. A proposed word version of an Amended Pre-Hearing Order will be sent to the Division via email.

Respectfully submitted,

HARDY MCLEAN LLC

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon the following counsel of record by electronic mail on April 2, 2026.

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**SELF-AFFIRMED STATEMENT  
OF SHELLEY C. KLINGLER**

1. I am a New Mexico Land Advisor with ConocoPhillips Company (“ConocoPhillips”). I am over 18 years of age, have personal knowledge of the matters addressed herein, and am competent to provide this Self-Affirmed Statement. I have previously testified before the New Mexico Oil Conservation Division (“Division”) and my credentials as an expert in petroleum land matters were accepted and made a matter of record.

2. COG Operating LLC (“COG”), a wholly owned subsidiary of ConocoPhillips, entered its appearance and objected to the above-referenced cases on January 23, 2026.

3. The Division held a status conference in these matters on February 26, 2026. At the status conference, the Division set the cases for a contested hearing on May 12, 2026, with the possibility of the hearing continuing on May 13, 2026. As discussed at the status conference, COG is filing competing applications, which will be consolidated with Tap Rock’s applications for the contested hearing.

4. Because the hearing will involve competing development plans and multiple witnesses for each side, it is unlikely to conclude in one day.

5. The Division subsequently notified the parties that the contested hearing would begin on May 13<sup>th</sup> and continue on May 19<sup>th</sup> to the extent necessary.

**EXHIBIT A**

6. I will testify as COG's land witness and am not available from May 14 to 20, 2026, due to pre-planned, non-refundable travel.

7. As a result, if the hearing begins on May 13, 2026, and does not conclude that day, which is likely, the hearing will need to be continued to a date after May 25, 2026. This delay would preclude the parties from presenting testimony in an orderly and uninterrupted manner, resulting in disruption to the presentation of evidence and potential prejudice.

8. The Division offered May 27, 2026, as an alternate date for the contested hearing.

9. In order to avoid a disruption in the presentation of testimony, Tap Rock and COG have agreed that it would be preferable to begin the hearing on May 27<sup>th</sup> with the possibility of continuing on May 28<sup>th</sup>.

10. I affirm that my testimony above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date next to my electronic signature below.

  
Shelley C. Klingler

4/1/2026  
Date