

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

**APPLICATION OF CHEVRON U.S.A., INC.
FOR A NON-STANDARD OIL, SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

Case No. 16132

**APPLICATION OF CHEVRON U.S.A., INC.
FOR A NON-STANDARD OIL, SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

Case No. 16133

**APPLICATION OF TAP ROCK, LLC FOR
COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

Case No. 16134

**APPLICATION OF TAP ROCK, LLC FOR
A NON-STANDARD SPACING AND PRORATION
UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

Case No. 16160

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by EOG Resources, Inc. (“EOG”) by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:

Tap Rock, LLC

ATTORNEY:

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APPLICANT: Chevron USA, Inc.

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OPPOSITION OR OTHER PARTY: EOG Resources, Inc.

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STATEMENT OF CASE

APPLICANT:

See, Prehearing Statements of the Applicants Tap Rock, LLC and Chevron USA Inc.

OPPOSITION OR OTHER PARTY:

The well proposals and force pooling actions of Tap Rock and Chevron USA conflict with EOG's plans for developing its interests in Section 23 and the S/2 of Section 14, Township 24 South, Range 31 East, NMPM. EOG is in the process of permitting wells to protect its correlative rights and will not join in or support the current proposals. EOG is also in the process of sending out its own well proposals. EOG's development plans in this area include ten (10) Leonard, nine (9) Third Bone Spring, and fifteen (15) Wolfcamp wells.

PROPOSED EVIDENCE

APPLICANT

| WITNESSES | EST. TIME | EXHIBITS |
|---|-----------|----------|
| See, Applicants' Prehearing Statements. | | |

OPPOSITION

| WITNESSES | EST. TIME | EXHIBITS |
|----------------------------------|-----------|---|
| Charles Moran, Petroleum Landman | 20 min. | Well Proposals and Plans of Development |
| Lorraine Baline, Geologist | 15 min. | Geological mapping |
| Shane Kelly, Engineer | 10 min. | Drilling Documentation |

PROCEDURAL MATTERS

EOG will file a motion to dismiss the Tap Rock, LLC applications because it was not sent well proposals in advance of the compulsory pooling applications, nor was it given notice of the applications.

PADILLA LAW FIRM, P.A.

/s/ Ernest L. Padilla
ERNEST L. PADILLA
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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of this Pre-Hearing Statement to be served upon the following by electronic mail on this 10th day of May 10, 2018:

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/s/ ERNEST L. PADILLA
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