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

APPLICATION OF TAP ROCK OPERATING, LLC FOR A STANDARD HORIZONTAL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

Case No. 20321

PRE-HEARING STATEMENT

Tap Rock Operating, LLC provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

APPLICANT'S ATTORNEYS

Tap Rock Operating, LLC

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OPPONENT

OPPONENT'S ATTORNEYS

None

n/a

STATEMENT OF THE CASE

In this case, Applicant seeks an order from the Division (1) creating a standard 320-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the W/2 of Section 13, Township 25 South, Range 27 East, NMPM, Eddy County, New Mexico, and (2) pooling all

uncommitted interests in the Wolfcamp formation (Purple Sage-Wolfcamp; Pool code [98220]) underlying the standard unit. The HSU is to be dedicated to the proposed **Delirium State Com** #201H well, to be horizontally drilled from an approximate surface location 334' FSL and 826' FWL of Section 13 to a bottom hole location 200' FNL and 330' FWL of Section 13. This is the "defining well" for this unit. Also to be drilled as an infill well is the **Delirium State Com** #215H well, to be horizontally drilled from an approximate surface location 334' FSL and 851' FWL of Section 13 to a bottom hole location 200' FNL and 990' FWL of Section 13.

The completed intervals and first and last take points for both wells are within the setbacks required by the Purple Sage-Wolfcamp Pool rules. The wells and lands are located approximately 7 miles Southwest of Malaga, New Mexico.

Also to be considered will be the costs of drilling and completing the wells and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the wells.

PROPOSED EVIDENCE

APPLICANT'S WITNESSES	EST. TIME	<u>EXHIBITS</u>
Matt Phillips, Land	20 min.	6
Adam Smith, Geologist	20 min.	4

PROCEDURAL MATTERS

This matter may be consolidated with Case No. 20320 for purposes of hearing.

Assuming no opposition by time of hearing, Tap Rock will present these matters by affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

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