

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

**APPLICATION OF EOG RESOURCES, INC.  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 21377**

**EOG RESOURCES, INC.'S PRE-HEARING STATEMENT**

EOG Resources, Inc. ("EOG") submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

EOG Resources, Inc.

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
kaluck@hollandhart.com

**OTHER PARTIES**

Tap Rock Resources, LLC

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
jamesbruc@aol.com

**APPLICANT’S STATEMENT OF CASE**

EOG seeks an order from the Division pooling all uncommitted interests in the Bone Spring formation [WC-025 G-08 S233528D; LWR BONE SPRING (97958)] underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the W/2 W/2 of Section 3, Township 24 South, Range 35 East and the W/2 W/2 of Section 34, Township 23 South, Range 35 East, NMPM, Lea County, New Mexico. EOG seeks to dedicate the above-referenced horizontal spacing unit to the proposed **Gladiator 3 Fed Com #301H well** to be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 3 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 34.

**APPLICANT’S PROPOSED EVIDENCE**

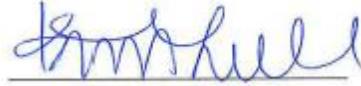
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Katie McBryde, Landman	Affidavit	Approx. 6
Denton O’Neal, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

If uncontested at the hearing, EOG intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



By: \_\_\_\_\_

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Kaitlyn A. Luck

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)

[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)

[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

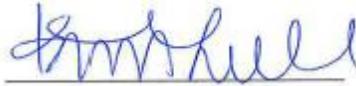
**ATTORNEYS FOR EOG RESOURCES, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
505-982-2043  
jamesbruc@aol.com

*Attorney for Tap Rock Resources, LLC*



---

Kaitlyn A. Luck