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

APPLICATION OF TAP ROCK OPERATING, LLC FOR APPROVAL OF AN OVERLAPPING HORIZONTAL SPACING UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 24811

TAP ROCK'S PRE-HEARING STATEMENT

Tap Rock Operating, LLC ("Tap Rock") submits this Pre-Hearing Statement for the abovereferenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

Tap Rock Operating, LLC

Jennifer L. Bradfute jennifer@bradfutelaw.com Phone: 505-264-8740

OPPONENT

None

ATTORNEY

N/A

STATEMENT OF CASE

This case is set for hearing on September 12, 2024. In Case No. 24811, Applicant seeks an order pooling a standard 1920 acre, more or less, horizontal well spacing unit in the Wolfcamp formation comprised of all of all of Sections 11 and 12, Township 25 South, Range 25 East, and all of Section 7 in Township 25 South, Range 26 East, NMPM, Eddy County, New Mexico. Said unit will be initially dedicated to the proposed High Life Fed Com 211H, High Life Fed Com 202H, High Life Fed Com 213H, and High Life Fed Com 204H wells, each of the wells to be horizontally drilled as follows:

• **High Life Fed Com 211H**, which will be drilled from a surface hole location the SE/4 NE/4 of Section 10, Township 25 South, Range 25 East (Unit H) to a bottom hole located

5 Feet from the East Line in Section 7 and 392 Feet from the North Line in Section 7 (Unit A) Township 25 South, Range 26 East.

- **High Life Fed Com 202H**, which will be drilled from a surface hole location the SE/4 NE/4 of Section 10, Township 25 South, Range 25 East (Unit H) to a bottom hole located 5 Feet from the East Line in Section 7 and 1,600 Feet from the North Line in Section 7 (Unit H) Township 25 South, Range 26 East.
- **High Life Fed Com 213H**, which will be drilled from a surface hole location the NW/4 SW/4 of Section 11, Township 25 South, Range 25 East (Unit L) to a bottom hole located 5 Feet from the East Line in Section 7 and 2,360 Feet from the South Line in Section 7 (Unit I) Township 25 South, Range 26 East.
- **High Life Fed Com 204H**, which will be drilled from a surface hole location the NW/4 SW/4 of Section 11, Township 25 South, Range 25 East (Unit L) to a bottom hole located 5 Feet from the East Line in Section 7 and 990 Feet from the South Line in Section 7 (Unit P) Township 25 South, Range 26 East.

This horizontal spacing unit will overlap the following existing Wolfcamp spacing unit: 320acre vertical well spacing unit covering the S/2 of Section 11, Township 25 South, Range 25 East, NMPM, Eddy County, New Mexico, dedicated to the Wild Hog 11 Federal #001 (API 30-015-31943). Also, to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, actual operating costs and charges for supervision, designation of Tap Rock Operating, LLC as operator of the wells, and a 200% charge for risk involved in drilling said wells. The subject area is located approximately 2.1 miles east of Whites City, New Mexico.

PROPOSED EVIDENCE

Currently, there are no objections to the case being presented by affidavit and Tap Rock intends to present this case by affidavit at the September 12, 2024, hearing. If, however, there is an objection to the case being presented by affidavit made before or at the hearing, Tap Rock requests to put on this case with witnesses who will be available to testify on Microsoft Teams. *Tap Rock has a drilling rig contracted to drill these wells in December and would like to present this case as soon as possible to the Division for its consideration.*

If the case is presented with witnesses via live testimony, Tap Rock will use the following

WitnessEstimated TimeExhibitsErica Shewmaker -
LandmanAffidavit or if needed by live
testimony approx. 20 min.Exhibits A – A-7Eli Denbesten -
GeologistAffidavit or if needed by live
testimony approx. 20 min.Exhibit B – B-5Affidavit by CounselExhibit C – C-4

witnesses to present its pre-filed exhibits.

PROCEDURAL MATTERS

Tap Rock does respectfully request an expedited order in this case, if possible.

Respectfully submitted,

Bradfute Consulting & Legal Services P.O. Box 90233 Albuquerque, NM 87199 Phone 505 264 8740

Phone 505.264.8740 jennifer@bradfutelaw.com

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

District IV 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

Page 4 of 4

Action 381061

QUESTIONS

Operator:	OGRID:
TAP ROCK OPERATING, LLC	372043
523 Park Point Drive	Action Number:
Golden, CO 80401	381061
	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.