

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

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

CASE NO. 25883

TAP ROCK OPERATING, LLC'S PRE-HEARING STATEMENT

Tap Rock Operating, LLC ("Tap Rock"), OGRID No. 372043, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Tap Rock Operating, LLC

ATTORNEY

Miguel A. Suazo
James P. Parrot
Jacob L. Everhart
Ryan McKee
Beatty & Wozniak, P.C.
500 Don Gaspar Ave.,
Santa Fe, NM 87505
(505) 946-2090
Fax: 800-886-6566
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jeverhart@bwenergylaw.com
rmckee@bwenergylaw.com

INTERESTED PARTY

Coterra Energy Operating, Inc.

ATTORNEY

Deana M. Bennett
Earl E. DeBrine, Jr.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
deana.bennett@modrall.com
earl.debrine@modrall.com

APPLICANT'S STATEMENT OF CASE

In this case, Tap Rock seeks orders to approve a standard 1,280-acre, more or less, horizontal spacing unit ("HSU") composed of All of Sections 34 and 35, Township 25 South, Range 25 East, N.M.P.M., Eddy County, New Mexico (the "Application Lands"), and to pool all uncommitted mineral interests in the Purple Sage; Wolfcamp Pool (98220), designated as a gas pool, underlying said HSU.

Under **Case 25883**, Tap Rock seeks to pool the Purple Sage; Wolfcamp Pool underlying the Application Lands and seeks to dedicate the HSU to the following proposed wells:

A. **Beer Cave Fed Com #202H** (API No. *Pending*), which is a gas well that will be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 35, Township 25 South, Range 25 East, to a bottom hole location in the Purple Sage; Wolfcamp Pool in the SW/4 NW/4 (Unit E) of Section 34, Township 25 South, Range 25 East;

B. **Beer Cave Fed Com #204H** (API No. *Pending*), which is a gas well that will be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 35, Township 25 South, Range 25 East, to a bottom hole location in the Purple Sage; Wolfcamp Pool in the SW/4 SW/4 (Unit M) of Section 34, Township 25 South, Range 25 East;

C. **Beer Cave Fed Com #211H** (API No. *Pending*), which is a gas well that will be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 35, Township 25 South, Range 25 East, to a bottom hole location in the Purple Sage; Wolfcamp Pool in the NW/4 NW/4 (Unit D) of Section 34, Township 25 South, Range 25 East; and

D. **Beer Cave Fed Com #213H** (API No. *Pending*), which is a gas well that will be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 35, Township 25 South, Range 25 East, to a bottom hole location in the Purple Sage; Wolfcamp Pool in the NW/4 SW/4 (Unit L) of Section 34, Township 25 South, Range 25 East.

The wells are orthodox in their locations as defined by 19.15.16.15(C) NMAC, and the take points and laterals comply with Statewide Rules for setbacks under 19.15.16.15(C) NMAC. Also to be considered will be the cost of drilling and completing the Wells and the allocation of the cost, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The wells and lands are located approximately 6.2 miles south of Whites City, New Mexico.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Kenneth Maxwell, Senior Landman	Affidavit	Approx. 5
Matt Jones, Vice President of Geoscience	Affidavit	Approx. 5

PROCEDURAL MATTERS

If uncontested at the hearing, Tap Rock intends to present these cases by affidavit.

Dated this 29th day of January, 2026.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: 

Miguel A. Suazo

James P. Parrot

Jacob L. Everhart

Ryan McKee

500 Don Gaspar Ave.,

Santa Fe, NM 87505

(505) 946-2090

msuazo@bwenergylaw.com

jparrot@bwenergylaw.com

jeverhart@bwenergylaw.com

rmckee@bwenergylaw.com

Attorneys for Tap Rock Operating, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 29th day of January 2026, as follows:

Deana M. Bennett
Earl E. DeBrine, Jr.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
deana.bennett@modrall.com
earl.debrine@modrall.com
Attorneys for Coterra Energy Operating, Inc.



Rachael Ketchledge

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 548317

QUESTIONS

Operator: TAP ROCK OPERATING, LLC 1700 Lincoln St Denver, CO 80203	OGRID: 372043
	Action Number: 548317
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	2
Testimony time (in minutes)	10