

**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:**

James Bruce  
PO Box 1056  
Santa Fe, NM 87504  
(505) 982-2043  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

APPLICANT:

Chevron USA, Inc.

ATTORNEY:

Gary Larson  
Hinkle Shanor LLP  
218 Montezuma Ave.  
Santa Fe, NM 87501  
[glarson@hinklelawfirm.com](mailto:glarson@hinklelawfirm.com)

OPPOSITION OR OTHER PARTY:

EOG Resources, Inc.

ATTORNEY:

Ernest L. Padilla  
Padilla Law Firm, P.A.  
P.O. Box 2523  
Santa Fe, NM 87504  
(505) 988-7577  
[padillalaw@qwestoffice.net](mailto:padillalaw@qwestoffice.net)

Douglas McLeod

Earl E. DeBrine, Jr.  
Jennifer L. Bradfute  
PO Box 2168  
Albuquerque, NM 87103-2168  
[edbrine@modrall.com](mailto:edbrine@modrall.com)  
[jennifer.bradfute@modrall.com](mailto:jennifer.bradfute@modrall.com)

### **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  
Attorney for Premier Oil & Gas, Inc.  
PO Box 2523  
Santa Fe, New Mexico 87504  
505-988-7577

### **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 10<sup>th</sup> day of May 10, 2018:

James Bruce  
Attorney at Law  
PO Box 1056  
Santa Fe, NM 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

Earl E. DeBrine, Jr.  
Jennifer L. Bradfute  
PO Box 2168  
Albuquerque, NM 87103-2168  
[edbrine@modrall.com](mailto:edbrine@modrall.com)  
[jennifer.bradfute@modrall.com](mailto:jennifer.bradfute@modrall.com)

Gary Larson  
Hinkle Shanor LLP  
218 Montezuma Ave.  
Santa Fe, NM 87501  
[glarson@hinklelawfirm.com](mailto:glarson@hinklelawfirm.com)

/s/ **ERNEST L. PADILLA**  
ERNEST L. PADILLA