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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF TAP ROCK RESOURCES, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 20596

APPLICATION OF TAP ROCK RESOURCES, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 20597

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Tap Rock Resources, LLC as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Tap Rock Resources, LLC

APPLICANT'S ATTORNEY

James Bruce P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attention:

Dana Arnold

OPPONENT

EOG Resources, Inc.

OPPONENT'S ATTORNEY

Holland & Hart, LLP

STATEMENT OF THE CASE

APPLICANT

Case No. 20596: Tap Rock Resources, LLC seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the W/2E/2 of Section 34, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico. The unit will be dedicated to the Frightened Turtle Fed. Com. Well No. 133H.

Case No. 20597:

Tap Rock Resources, LLC seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the E/2E/2 of Section 34, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico. The unit will be dedicated to the Frightened Turtle Fee Well No. 134H.

Also to be considered in each case will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of Tap Rock Operating, LLC as operator of the well, and a 200% charge for the risk involved in drilling and completing the well.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Erica Hixson (landman)	15 min.	Approx. 10
Adam Smith/Emily Lange (geologist)	10 min.	Approx. 6

OPPONENT

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	-----------------

PROCEDURAL MATTERS

If the cases are unopposed they may be submitted by affidavit.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Tap Rock Resources, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this day of September, 2019 by e-mail:

Michael Feldewert <u>mfeldewert@hollandhart.com</u>

Adam Rankin agrankin@hollandhart.com

Julia Broggi jbroggi@hollandhart.com

James Bruce