

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

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

Case No. 21062

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

Attention: Dana Arnold

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

EOG Resources, Inc.

OPPONENT'S ATTORNEY

Holland & Hart, LLP

STATEMENT OF THE CASE

APPLICANT

Tap Rock Resources, LLC seeks an order pooling all mineral interests in the Wolfcamp formation underlying a (proximity tract) horizontal spacing unit comprised of the W/2 of Section 4 and the W/2 of Section 9, Township 24 South, Range 33 East, NMPM, Lea County, New Mexico. The unit will be dedicated to (a) the Poseidon State Com. Well Nos. 101H, 105H, 171H, 181H, and 185H, with first take points in the SW/4SW/4 of Section 9 and last take points in the NW/4NW/4 of Section 4; and (b) the Poseidon State Com. Well Nos. 102H, 107H, 172H, 175H, 182H, and 187H, with first take points in the SE/4SW/4 of Section 9 and last take points in the NE/4NW/4 of Section 4. Also to be considered will be the cost of drilling and completing the wells 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 wells, and a 200% charge for the risk involved in drilling and completing the wells.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

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

OPPONENT

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
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PROCEDURAL MATTERS

If the case is unopposed it 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 30th day of January, 2020 by e-mail:

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