

**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. 21342

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

The Allar Company

Franklin Mountain Energy
Royalty Investments, LLC
Sandia Minerals, LLC

Advance Energy Partners Hat Mesa, LLC

Starboard Permian Resources, LLC
Monticello Minerals, LLC
Max Permian, LLC

OPPONENT'S ATTORNEY

Ernest L. Padilla

Deana Bennett

Dana Hardy

Adam Rankin

STATEMENT OF THE CASE

APPLICANT

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 18 and the E/2E/2 of Section 19, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. The unit will be dedicated Black Marlin Fed. Com. Well Nos. 204H, 214H, and 216H, to be

drilled to a depth sufficient to test the Wolfcamp formation. The wells have first take points in the NE/4NE/4 of Section 18 and last take points in the SE/4SE/4 of Section 19. Applicant seeks to dedicate the E/2E/2 of Section 18 and the E/2E/2 of Section 19 to the wells. The Black Marlin Fed. Com. Well No. 216H is at an unorthodox well location, being located 1210 feet from the east lines of Sections 18 and 19, and applicant requests approval of the location. Also to be considered will be the cost of drilling, completing, and equipping 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, completing, and equipping the wells.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

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

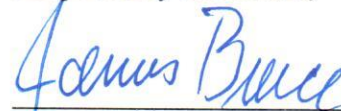
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
------------------	------------------	-----------------

PROCEDURAL MATTERS

The case will 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 13th day of August, 2020 by e-mail:

Deanna Bennett
dmb@modrall.com

Michael Feldewert
mfeldewert@hollandhart.com

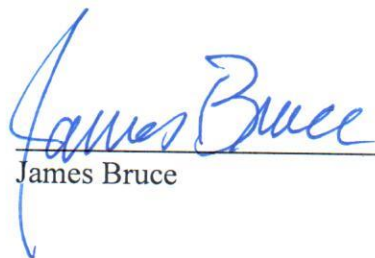
Adam Rankin
agrarkin@hollandhart.com

Julia Broggi
jbroggi@hollandhart.com

Kaitlyn Luck
kaluck@hollandhart.com

Ernest L. Padilla
padillalaw@qwestoffice.net

Dana Hardy
dhardy@hinklelawfirm.com


James Bruce