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:

APPLICATIONS OF COG OPERATING LLC FOR COMPULSORY POOLING, LEA COUNTY, **NEW MEXICO.**

Case Nos. 21659 - 21662

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

COG Operating LLC

OPPONENT

Tap Rock Resources, LLC

APPLICANT'S ATTORNEY

Ocean Munds-Dry

OPPONENT'S ATTORNEY

James Bruce P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attention:

Dana Arnold

STATEMENT OF THE CASE

APPLICANT

In these cases applicant seeks to pool, collectively, the Bone Spring and Wolfcamp formations underlying the E/2 of Sections 4 and 9 in Township 24 South, Range 34 East, NMPM.

OPPONENT

Tap Rock Resources, LLC has competing applications in Case Nos. 21568, 21572, and 21573. These cases are scheduled for hearing on April 8, 2021 under a Pre-Hearing Order entered on February 5, 2021.

PROPOSED EVIDENCE

APPLICANT

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

EXHIBITS

Erica Hixson (landman)

15 min.

Approx. 10

Emily Lange (geologist)

15 min.

Approx. 6

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Tap Rock Resources, LLC requests that all cases be consolidated for hearing on April 8th.

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 25 to day of February, 2021 by e-mail:

Ocean Munds-Dry

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James Bruce