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

APPLICATIONS OF MATADOR PRODUCTION COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

Case Nos. 21994 – 21995, 22010 – 22013

#### PRE-HEARING STATEMENT

EOG Resources, Inc. ("EOG") hereby submits its Pre-hearing Statement pursuant to the rules of the Oil Conservation Division of the State of New Mexico ("Division" or "OCD").

#### **APPEARANCES**

ApplicantAttorneyMatador Production CompanyJames BruceP.O. Box 1056

Santa Fe, New Mexico 87504

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**Opponent** Attorney

EOG Resources, Inc. Jobediah Rittenhouse

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#### STATEMENT OF THE CASE

Matador Production Company ("Matador" or "Applicant") seeks orders pooling all uncommitted interests in the Wolfcamp and Bone Spring Formations underlying standard approximate 320-acre horizonal spacing units in portions of Sections 27, 28, 33, and 34, Township 20 South, Range 29 East, N.M.P.M., Eddy County, New Mexico, as follows:

- In Case No. 21994, Matador seeks to pool the N/2N/2 of Section 33 and the N/2N/2 of Section 34 and initially dedicate this 320-acre spacing unit to the proposed Medford
   3334 Fed. Com. Well No. 201H to a depth sufficient to test the Wolfcamp Formation.
- In Case No. 21995, Matador seeks to pool the S/2N/2 of Section 33 and the S/2N/2 of Section 34 and initially dedicate this 320-acre spacing unit to the proposed Medford
   3334 Fed. Com. Well No. 202H to a depth sufficient to test the Wolfcamp Formation.
- In Case No. 22010, Matador seeks to pool the S/2S/2 of Section 28 and the S/2S/2 of Section 27 and initially dedicate this 320-acre spacing unit to the proposed Ed Drake
   2827 Fed. Com. Well No. 204H to a depth sufficient to test the Wolfcamp Formation.
- In Case No. 22011, Matador seeks to pool the N/2N/2 of Section 28 and the N/2N/2 of Section 27 and initially dedicate this 320-acre spacing unit to the proposed Ed Drake 2827 Fed. Com. Well No. 121H and the Ed Drake 2827 Fed. Com. Well No. 135H to a depth sufficient to test the Bone Spring Formation.
- In Case No. 22012, Matador seeks to pool the S/2N/2 of Section 28 and the S/2N/2 of Section 27 and initially dedicate this 320-acre spacing unit to the proposed Ed Drake 2827 Fed. Com. Well No. 122H and the Ed Drake 2827 Fed. Com. Well No. 136H to a depth sufficient to test the Bone Spring Formation.
- In Case No. 22013, Matador seeks to pool N/2S/2 of Section 28 and the N/2S/2 of Section 27 and initially dedicate this 320-acre spacing unit to the proposed Ed Drake 2827 Fed. Com. Well No. 123H and the Ed Drake 2827 Fed. Com. Well No. 137H to a depth sufficient to test the Bone Spring Formation.

EOG is an owner of an interest in the mineral estate in the lands set forth above. However, to date EOG has not received notice of the applications. Moreover, EOG has mailed well proposals

and will be filing competing pooling applications with the Division covering these lands and formations. The Division has currently set these cases for hearing on August 19, 2021

#### **PROPOSED EVIDENCE**

<b>Witness</b>	<b>Estimated Time</b>	<b>Exhibits</b>
Laci Stretcher, Landman	15 minutes	Approximately six (6) exhibits
Brandon Swain, Geologist	15 minutes	Approximately three (3) exhibits
Carlos Sonka, Engineer	15 minutes	Approximately three (3) exhibits

## **PROCEDURAL MATTERS**

EOG requests the Division consolidate these cases and further proposes a continuance of the subject cases to December 2, 2021. If EOG is unable to obtain agreement from Matador, EOG will move for a continuance.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: Jobediah Rittenhouse 216 16<sup>th</sup> St., Suite 1100 Denver, CO 80202 (303) 407-4499

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Attorney for EOG Resources, Inc.

# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 12<sup>th</sup> day of August, 2021, as follows:

James Bruce (jamesbruc@aol.com)

Attorney for Matador Production Company

Jobediah Rittenhouse

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QUESTIONS

Action 41674

#### **QUESTIONS**

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	41674
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witness	3	
Testimony time (in minutes)	45	