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

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

CASE NOS. 22417, 22418, 22419, 22420

MATADOR'S CONSOLIDATED PRE-HEARING STATEMENT

Matador Production Company (OGRID No. 228937), the applicant in the above-referenced matters, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

Matador Production Company ("Matador")

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart, LLP Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com

APPLICANT'S STATEMENT OF THE CASE

In Case No. 22417, Matador seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 SW/4 of Section 18, the W/2 W/2 of Section 19, and the W/2 NW/4 of Section 30, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico, and (2) dedicating the spacing unit to the proposed initial Lonnie King Fed Com #135H well, to be drilled

from a surface location in the SW/4 NW/4 (Unit E) of Section 30, to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 18.

In Case No. 22418, Matador seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 SW/4 of Section 18, the E/2 W/2 of Section 19, and the E/2 NW/4 of Section 30, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico, and (2) dedicating the spacing unit to the proposed initial Lonnie King Fed Com #136H well, to be drilled from a surface location in the SW/4 NW/4 (Unit E) of Section 30, to a bottom hole location in the NE/4 SW/4 (Unit K) of Section 18.

In Case No. 22419, Matador seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 SW/4 of Section 18, the W/2 W/2 of Section 19, and the W/2 NW/4 of Section 30, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico, and (2) dedicating the spacing unit to the proposed initial Lonnie King Fed Com #211H well, to be drilled from a surface location in the SW/4 NW/4 (Unit E) of Section 30, to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 18.

In Case No. 22420, Matador seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 SW/4 of Section 18, the E/2 W/2 of Section 19, and the E/2 NW/4 of Section 30, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico, and (2) dedicating the spacing unit to the proposed initial Lonnie King Fed Com #212H well, to be drilled from a surface location in the SW/4 NW/4 (Unit E) of Section 30, to a bottom hole location in the NE/4 SW/4 (Unit K) of Section 18.

Matador has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|----------------------------|----------------|-----------|
| David Johns, Landman | Affidavit | Approx. 6 |
| Andrew Parker, Geologist | Affidavit | Approx. 3 |

PROCEDURAL MATTERS

Matador requests that these matters be consolidated for hearing and intends to present these cases by affidavit if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: _____

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck

Post Office Box 2208 Santa Fe, NM 87504

505-998-4421

505-983-6043 Facsimile

mfeldewert@hollandhart.com

agrankin@hollandhart.com

jbroggi@hollandhart.com

kaluck@hollandhart.com

ATTORNEYS FOR MATADOR PRODUCTION COMPANY

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 69540

QUESTIONS

| Operator: | OGRID: |
|----------------------------|--|
| MATADOR PRODUCTION COMPANY | 228937 |
| One Lincoln Centre | Action Number: |
| Dallas, TX 75240 | 69540 |
| | Action Type: |
| | [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

| Testimony | | |
|---|---------------|--|
| Please assist us by provide the following information about your testimony. | | |
| Number of witnesses | Not answered. | |
| Testimony time (in minutes) | Not answered. | |