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

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

CASE NOS. 21148 - 21151

MATADOR'S CONSOLIDATED PRE-HEARING STATEMENT

Matador Production Company ("Matador") (OGRID No. 228937), the applicant in the

above cases, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil

Conservation Division.

APPEARANCES

APPLICANT

Matador Production Company 5400 LBJ Freeway, Suite 1500 Dallas, Texas 75240

ATTORNEY

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 mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com

OTHER PARTIES

ConocoPhillips Company¹

Darin Savage ABADIE & SCHILL, PC 214 McKenzie Street Santa Fe, New Mexico 87501 Telephone: 970.385.4401 darin@abadieschill.com

¹ ConocoPhillips has appeared in Cases 21150-21151 (involving the E/2 acreage) but not in Cases 21148-21149 (involving the W/2 acreage).

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, Matador seeks orders pooling four standard 320-acre, more or less, horizontal spacing units in the Bone Spring formation (Featherstone; Bone Spring Pool (Pool Code 24250)) underlying Sections 16 and 21, Township 20 South, Range 35 East, NMPM, Lea County, New Mexico as follows:

- In Case No. 21148, Matador seeks to pool the W/2 W/2 of Sections 16 and 21 to be initially dedicated to the proposed Uncle Ches 2116 Fed Com #121H well (API No. 30-025-pending) to be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 21, to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 16.
- In Case No. 21149, Matador seeks to pool the E/2 W/2 of Sections 16 and 21 to be initially dedicated to the proposed Uncle Ches 2116 Fed Com #122H well (API No. 30-025-46432) to be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 21, to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 16.
- In Case No. 21150, Matador seeks to pool the W/2 E/2 of Sections 16 and 21 to be initially dedicated to the proposed Uncle Ches 2116 Fed Com #123H well (API No. 30-025-pending) to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 21, to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 16.
- In Case No. 21151, Matador seeks to pool the E/2 E/2 of Sections 16 and 21 to be initially dedicated to the proposed Uncle Ches 2116 Fed Com #124H well (API No. 30-025-44520) to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 21, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 16.

The completed intervals for these wells will comply with the statewide setbacks for oil wells.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Sam Prior, Landman	Affidavit	Approx. 5
James Andrew Juett, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

ConocoPhillips has entered an appearance in Cases 21150 and 21151 (involving the E/2 acreage) but does not oppose these cases being present by affidavit. Accordingly, Matador intends to present all four of these consolidated cases by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

275 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

CERTIFICATE OF SERVICE

I hereby certify that on April 09, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Darin Savage ABADIE & SCHILL, PC 214 McKenzie Street Santa Fe, New Mexico 87501 Telephone: 970.385.4401 darin@abadieschill.com

Attorney for ConocoPhillips Company²

nf-

Michael H. Feldewert

 $^{^2}$ ConocoPhillips has appeared in Cases 21150-21151 (involving the E/2 acreage) but not in Cases 21148-21149 (involving the W/2 acreage).