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

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

CASE NO. 21542

MATADOR'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT ATTORNEY

Matador Production Company 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 INTERESTED PARTIES

Flat Creek Resources Darin C. Savage

Andrew D. Schill William E. Zimsky 214 McKenzie Street

Santa Fe, New Mexico 87501

(970) 385-4401

darin@abadieschill.com andrew@abadieschill.com bill@abadieschill.com

APPLICANT'S STATEMENT OF CASE

In Case No. 21542, Matador seeks an order: (1) pooling all uncommitted interests in the Morrow formation (Carlsbad; Morrow, South (Gas) Pool (73960)) underlying a standard 320-acre, more or less, spacing unit comprised of the S/2 of Section 23, Township 23 South, Range 27 East, Eddy County, New Mexico; and (2) dedicating this vertical spacing unit to the proposed Norris-Thornton Com #2H well (API No. 30-015-42700) that has been drilled from a surface location in the NE/4 SE/4 (Unit I) of Section 23. The Division issued Administrative Order NSL-7626 approving the non-standard location of this well.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Sarah Hartsfield, Landman	Affidavit	Approx. 5
Daniel Brugioni, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

Matador intends to present Case No. 21542 by affidavit, if unopposed at the time of the 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

15790407_v1

CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Darin C. Savage
Andrew D. Schill
William E. Zimsky
ABADIE & SCHILL, PC
214 McKenzie Street
Santa Fe, New Mexico 87501
(970) 385-4401
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

Attorneys for Flat Creek Resources

Kaitlyn A. Luck