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. 21545 - 21548

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

APPLICANT'S STATEMENT OF CASE

In Case No. 21545, Matador seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation (Bilbrey Basin; Bone Spring Pool (5695)) underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Sections 3 and 10, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico; and (2) dedicating this horizontal spacing unit to the proposed initial Nina Cortell Fed Com #127H well (API No. 30-025-pending) to be horizontally drilled from a surface

location in the SW/4 SE/4 (Unit O) of Section 10 to a bottom hole location in NW/4 NE/4 (Unit B) of Section 3.

In Case No. 21546, Matador seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation (Bilbrey Basin; Bone Spring Pool (5695)) underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 3 and 10, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico; and (2) dedicating this horizontal spacing unit to the proposed initial Nina Cortell Fed Com #128H well (API No. 30-025-pending) to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 10 to a bottom hole location in NE/4 NE/4 (Unit A) of Section 3.

In Case No. 21547, Matador seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S233216K; UPR WOLFCAMP Pool (98166)) underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Sections 3 and 10, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico; and (2) dedicating this horizontal spacing unit to the proposed initial Nina Cortell Fed Com #203H well (API No. 30-025-pending) to be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 10 to a bottom hole location in NW/4 NE/4 (Unit B) of Section 3.

In Case No. 21548, Matador seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S233216K; UPR WOLFCAMP Pool (98166)) underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 3 and 10, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico; and (2) dedicating this horizontal spacing unit to the proposed initial Nina

Cortell Fed Com #204H well (API No. 30-025-pending) to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 10 to a bottom hole location in NE/4 NE/4 (Unit A) of Section 3.

The completed intervals for each of these wells will comply with statewide setbacks.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Robert Helbing, Landman	Affidavit	Approx. 5
Andrew Parker, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

Matador intends to present these consolidated cases 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