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

APPLICATION OF CATENA RESOURCES OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 21483

APPLICATION OF CATENA RESOURCES OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 21460

# AMENDED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MRC Permian Company and Matador Production Company (collectively "Matador") as required by the Oil Conservation Division.

#### **APPEARANCES**

**APPLICANT** 

Catena Resources Operating, LLC

Catena Resources Operating, LLC

**OPPONENT** 

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

Attention:

**Kyle Perkins** 

APPLICANT'S ATTORNEY

Ernest L. Padilla (Case No. 21583)

Holland & Hart, LLP (Case No. 21640) 400

OPPONENT'S ATTORNEY

James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

#### STATEMENT OF THE CASE

#### APPLICANT

In Case No. 21483, applicant seeks an order pooling all mineral interests in the Bone Spring formation underlying the E/2E/2 of Section 8 and the E/2E/2 of Section 17, Township 19 South, Range 35 East, NMPM.

In Case No. 21460, applicant seeks an order pooling all mineral interests in the Wolfcamp formation underlying the E/2 of Section 8 and the E/2 of Section 17, Township 19 South, Range 35 East, NMPM.

#### **OPPONENT**

Matador has a competing development plan and has filed pooling competing applications in Case Nos. 21578 and 21579. Therefore, Matador opposes the application. The cases should be consolidated for hearing.

#### PROPOSED EVIDENCE

## **APPLICANT**

## **OPPONENT**

WITNESSES	EST. TIME	EXHIBITS
Sam Pryor (landman)	20 min.	Approx. 10
Andy Juett (geologist)	20 min.	Approx. 10

#### PROCEDURAL MATTERS

Matador objects to these cases being presented by affidavit, and requests that a status conference be held.

Respectfully submitted,

James Bruce

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Attorney for MRC Permian Company and Matador Production Company

# **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this \_\_\_\_\_\_ day of January, 2021 by e-mail:

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