

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

IN THE MATTER OF THE HEARING CALLED BY THE
OIL CONSERVATION DIVISION FOR THE PURPOSE
OF CONSIDERING:

CASE NO. 13604

APPLICATION OF MATRIX NEW MEXICO
HOLDINGS, L.L.C., TO AMEND ORDER NO. R-12291
TO MODIFY THE PROPOSED WELL LOCATION FOR
THE TOWNSEND WELL NO. 2 TO A NON-STANDARD
LOCATION, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Matrix New Mexico Holdings, L.L.C.
Attn: Mr. Fred Bryla
5725 Commonwealth Boulevard
Sugarland, Texas 77479
(281) 265-1212

ATTORNEY

William F. Carr, Esq.
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STATEMENT OF CASE

APPLICANT

Applicant in the above-styled cause seeks the amendment if Order No. R-12291 entered on February 25, 2005 that pooled uncommitted interests from the surface through the Wolfcamp formation in the SE/4 NE/4 of Section 10, Township 13 South, Range 38 East, NMPM to form a standard spacing and proration unit for all formations developed on 40-acre spacing

WVJ 12/12/05

within that vertical extent which includes but is not necessarily limited to the Undesignated Bronco-Wolfcamp Pool. Applicant seeks to amend the location of its Townsend Well No. 2 to be drilled at a non-standard location 1475 feet from the North line and 780 feet from the East line of said Section 10 to a depth sufficient to test all formations through the Wolfcamp formation. Said area is located approximately 3 miles southwest of Bronco, Texas.

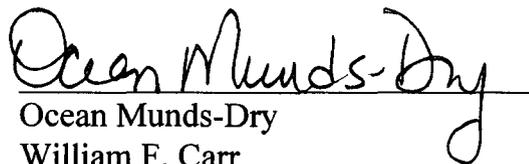
PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u> (Name and Expertise)	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Fred Bryla (Petroleum Engineer)	Approx. 20 Minutes	Approx. 8

PROCEDURAL MATTERS

Matrix New Mexico Holdings, L.L.C., will request that these cases be consolidated for the purpose of hearing.



Ocean Munds-Dry
William F. Carr

Attorneys for Matrix New Mexico Holdings,
L.L.C.