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

# APPLICATION OF MATADOR PRODUCTION COMPANY FOR COMPULSORY POOLING AND APPROVAL OF AN UNORTHODOX WELL LOCATION, EDDY COUNTY, NEW MEXICO.

Case No. 15498

#### **PRE-HEARING STATEMENT**

Caza Petroleum, Inc., ("Caza"), provides this Pre-Hearing Statement as required by the

rules of the Division.

## APPEARANCES

## APPLICANT:

MATADOR PRODUCTION COMPANY Michael H. Feldewert Jordan L. Kessler Holland & Hart LLP Post Office Box 2208 Santa Fe, NM 87504-2208 <u>mfeldewert@hollandhart.com</u> jlkessler@hollandhart.com

APPLICANT'S ATTORNEY

Dana R. Arnold Matador Production Company darnold@matadorresources.com

**OPPONENT/OTHER PARTIES:** 

## CAZA PETROLEUM, INC.'s ATTORNEY

CAZA PETROLEUM, INC.

J. Scott Hall, Esq. MONTGOMERY & ANDREWS, P.A. P.O. Box 2307 Santa Fe, NM 87504-2307 Tele (505) 982-3873 shall@montand.com

#### STATEMENT OF THE CASE

Matador Production Company seeks an order (1) pooling all mineral interests in the Wolfcamp formation underlying the 320-acre, more or less, spacing and proration unit comprised of the N/2 of Section 13, Township 24 South, Range 27 East, N.M.P.M., Eddy County, New Mexico; and (2) approving an unorthodox well location for its proposed Brantley State Com 13-24-S-27E RB No. 221H well.

Matador's well proposal and compulsory pooling application were preceded by those of Caza Petroleum, Inc. for its Mad River 13 State Well No. 1H which was previously permitted and to which the W/2 of Section 13 is dedicated. Please refer to the Pre-Hearing Statement filed on behalf of Caza in Case No. 15491.

# **PROPOSED EVIDENCE**

<u>APPLICANT'S WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
John E. Brown, Land Manager	20 min.	6
Randy Nickerson, Geologist	20 min.	5
Steve Morris, Petroleum Engineer	20 min.	4
OPPONENT'S WITNESSES	<u>EST. TIME</u>	<u>EXHIBITS</u>
Matador has listed seven witnesses in its Pre-Hearing Statement.	Unk.	Unk.

# **PROCEDURAL MATTERS**

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: J. Scott Hall

J. Scott Hall, Esq. Post Office Box 2307 Santa Fe, New Mexico 87504-2307 (505) 982-3873 (505) 982-4289 fax shall@montand.com

Attorneys for Caza Petroleum, Inc.

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on June 22, 2016:

Michael H. Feldewert Jordan L. Kessler Holland & Hart LLP Post Office Box 2208 Santa Fe, NM 87504-2208 <u>mfeldewert@hollandhart.com</u> <u>jlkessler@holl</u>andhart.com

Dana R. Arnold Matador Production Company <u>darnold@matadorresources.com</u>

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