

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

**APPLICATION OF MATADOR PRODUCTION COMPANY FOR A NON-STANDARD  
SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

**CASE NO. 15363 (*de novo*)**

**NMOGA's NOTICE OF INTERVENTION**

The New Mexico Oil & Gas Association (NMOGA), through undersigned counsel, hereby serves notice of intervention in this matter pursuant to NMAC 19.15.4.11.

NMOGA is a long-standing trade association representing the interests of New Mexico oil and gas producing, refining, processing, transportation and field service companies. NMOGA routinely appears in legislative, regulatory and legal proceedings affecting the oil and gas industry in New Mexico and the interests of its members. For example, NMOGA appeared in and presented evidence in Commission Case No. 14744, which resulted in the issuance of Order R-13499 adopting the horizontal well rules codified under NMAC 19.15.16.1 et. seq. NMOGA and its members participated in the Division workgroup convened in 2003 to address compulsory pooling issues and subsequently appeared in the proceedings under Commission Case No. 13069, which resulted in the issuance of Commission Order R-11992 adopting the compulsory pooling rules codified under NMAC 19.15.13.1 et. seq.

Jalapeno Corporation has filed a motion in this proceeding to "declare the rights and obligations of parties in a pooling application under NMSA 1978, § 70-2-17." See Motion filed August 1, 2016. NMOGA has therefore chosen to become a party of record in this proceeding to protect the interests of its members, because of its experience with the Division rules that are the

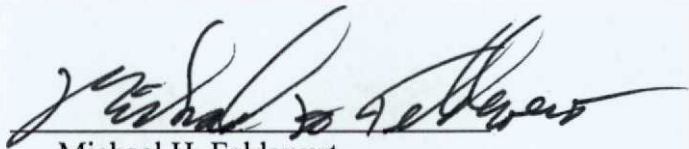
RECEIVED OGD  
2016 AUG 30 P 4:10

subject of Jalapeno Corporation's motion, and to support these rules to the extent they are now challenged by Jalapeno Corporation.

NMOGA does not anticipate presenting any exhibits or calling any witnesses at the Commission hearing in this matter.

Respectfully,

HOLLAND & HART LLP

A handwritten signature in black ink, appearing to read "Michael H. Feldewert", is written over a horizontal line.

Michael H. Feldewert

Jordan L. Kessler

Post Office Box 2208

Santa Fe, NM 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

[jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

**ATTORNEYS FOR  
N. M. OIL & GAS ASSOCIATION**


**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following  
counsel of record this 30th day of August, 2016 via electronic mailing to:

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
(505) 982-2151 Facsimile  
jamesbruc@aol.com

J.E. Gallegos  
Michael J. Condon  
Gallegos Law Firm, P.C.  
460 St. Michael's Drive, Bldg. 300  
Santa Fe, New Mexico 87505  
(505) 983-6675  
jeg@galleslawfirm.net  
mjc@gallegoslawfirm.net

David K. Brooks  
Energy, Minerals and Natural Resources  
Department  
1120 South St. Francis Drive  
Santa Fe, New Mexico 87505  
(505) 476-3458  
david.brooks@state.nm.us

A handwritten signature in black ink, appearing to read "Michael H. Feldewert", is written over a horizontal line.

Michael H. Feldewert  
Jordan L. Kessler