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

Wi , -5,

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

Case No 15363

JALAPENO'S OBJECTION TO MATADOR'S WELL COSTS

Pursuant to Order No R-14053-E Jalapeno Corporation (Jalapeno) files this Objection to the Cost Bill furnished by Matador Production Company (Matador) to the Division on or about April 21 2017 As grounds for this Objection Jalapeno states as follows

- The Oil Conservation Commission approved Matador's force pooling application in this case on de novo hearing by Order No R-14053-E Paragraph 11 of that Order requires Matador to furnish the Division and each known working interest owner an itemized schedule of actual well costs within 90 days following completion of the well
- On or about April 21 2017 Matador provided to the Division its Well Cost Notification which Matador claims was submitted pursuant to the requirement of Order No R-14053-E given that the well at issue has now been drilled and completed. The Notification does not include an itemized schedule of costs, but simply lists gross cost amounts by category. A copy of the Notification is attached as Exhibit A.
- 3 Matador did not provide a copy of this Notification to Jalapeno Nevertheless Jalapeno discovered the Notification on or about May 16 2017 when

reviewing the case file on the Division's website. Jalapeno has requested a true itemized list of expenses, but to date none has been furnished.

- 4 Jalapeno takes exception to the entire Well Cost Notification because it cannot determine which listed costs are or are not reasonable based on the conclusory nature of the listed expenses
- 5 On or about May 31 2016 Matador furnished an Estimate of Costs and Authorization for Expenditure A copy is attached as Exhibit B. The estimate provides the type of itemized expenses that should have been included in the Well Cost Notification.
- The actual costs reported by Matador in the Well Cost Notification have increased significantly from the projected costs reflected in Exhibit B
- Jalapeno will be responsible for its share of actual costs of drilling the well and a risk penalty. The Commission denied Matador's request for a 200% risk penalty and instead approved a 150% risk penalty on drilling and completion costs. The Commission denied Matador's request for a risk penalty on surface equipment costs. Consequently, the expenses reflected in the Well Cost Notification are of concern to Jalapeno. Individual expense items may be subject to challenge upon provision by Matador of an itemized schedule.
- 8 Both the Division and Jalapeno are entitled to a detailed itemized schedule of costs to evaluate whether the reported costs are actual and reasonable

WHEREFORE Jalapeno requests that the Division order Matador to provide a detailed itemized Well Cost Notification to both Jalapeno and the Division and set a hearing following service of that Notification to resolve any remaining objections

Respectfully submitted

GALLEGOS LAW FIRM PC

By /s/ Michael J Condon
J E GALLEGOS
MICHAEL J CONDON
460 St Michael's Drive Bldg 300
Santa Fe New Mexico 87505
(505) 983 6686
jeg@gallegoslawfirm net
mjc@gallegoslawfirm net

Attorneys for Jalapeno Corporation

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail this 5th day of June 2017 to

James Bruce P O Box 1056 Santa Fe NM 87504 jamesbruc@aol com Dana Arnold
Matador Production Co
One Lincoln Centre
5400 LBJ Freeway Suite 1500
Dallas TX 75240
darnold@matadorresources.com

Michael Feldewert
Adam Rankin
Jordan Kessler
Holland & Hart LLP
P O Box 2208
Santa Fe NM 87504
mfeldewert@hollandhart com
arankin@hollandhart com
ilkessler@hollandhart com

/s/ Michael J Condon
Michael J Condon

Matador Production Company

One Lincoln Centre 5400 LBJ Freeway Suite 1500 Dallas Texas 75240 Voice 972 371 5284 Fax 214 866 4832 darnold@matadorresources com

Dana R Arnold
Operations and Regulatory Counsel

April 20 2017

New Mexico Oil Conservation Division Attn David Catanach 1220 South St Francis Drive Santa Fe New Mexico 87505 David Catanach@state nm us

> Re Well Cost Notification Case No 15363 Order No R 14053 E

Dear Mr Catanach

ACTIVITY

Pursuant to Paragraph 11 of Order No R 14053 E, Matador Production Company hereby submits notice that the Airstrip 31 28 35 State Com Well No 201H well has been drilled and completed and the following are the itemized schedule of well costs as of today s date

	Intangible	Tangible
Drilling	\$ 2 878,439	\$ 770 683
Completion	\$ 2 871 499	\$ 47 581
Production	\$ 89 405	\$ 152,826
Surface Equipment	\$ 90 176	\$ 902 310 81
Total	\$ 5 929 519	\$ 1 873 400 81

Sincerely

Dana R Arnold

MATADOR PRODUCTION COMPANY

ONE LINCOLN CENTRE - 5400 LBJ FREEWAY - SUITE 1500 - DALLAS, TEXAS 75240 Phone (972) 371-5200 - Fax (972) 371-5201

		ESTIMATE OF COSTS AN	D AUTHORIZATION FOR			
DATE:	May 9 2016		A CONTRACTOR OF THE PARTY OF TH	AFE NO.:		300017-014-01
WELL NAME:	Airstrip State Com 31	-18S-35E RN 201H	FIELD:			Wolfcamp
LOCATION				MD/TVD	-	15700710780
COUNTY/STATE: MRC WI:	Lea			LATERAL LENGTH		4 300
GEOLOGIC TARGET:	Wolfcamp A					
REMARKS		nonzontal Wolfcamp A wel	with 21 stages Instal	AL, build TB, and con-	struct PL to gas connec	t.
		DRILLING	COMPLETION	PRODUCTION		TOTAL
INTANGIBLI		COSTS	COSTS	COSTS	FACILITY COSTS	COSTS
Land / Legal / Regulatory Location, Surveys & Dam		\$ 95.000 111.500	17,500	5,000	\$	\$ 95,000 134,000
Drilling		707,000	11,500	0,000		707,000
Cementing & Float Equip		205,000		~~~		205,000
Logging / Formation Eval Mud Logging	luation	32,500	3,850	-	-	3,850 32,500
Mud Circulation System		34,720		-		34,720
Mud & Chemicals		120,000	24,000			144,000
Mud / Wastewater Dispos Freight / Transportation	sa ¹	155,000	16,500	***************************************		155,000 34,500
Rig Supervision / Engine	ering	95.200	52,300	2,400	30,000	179,900
Drill Bits		97,000	***************************************			97,000
Fuel & Power Water		70,000 42,500	530,000	-	***************************************	70,900 572,500
Drig & Completion Overl	nead	14,000	7,500		*****	21,500
Plugging & Abandonmer	nt .				***************************************	
Directional Drilling, Surv Completion Unit, Swab,		185.000	60,000	12,000	-	185,000 72,000
Perforating, Wireline, Si		*	66,000	16,000	COTTON TO THE PARTY OF THE PART	68,000
High Pressure Pump Tru		*	33,000	10,500	***************************************	43 500
Stimulation Flourback 8	Dies		945,000	2.000	-	945 000
Stimulation Flowback & Insurance	Dish	27,000	45,500	6,000		51,500 27,000
Labor		124,000	15,500	6 000	-	145.500
Rental - Surface Equipm		101,200	112 020	450	6,000	219 670
Rental - Downhole Equip Rental - Living Quarters	oment	45.000 60.875	38,000 26,950	150	1,000	83.000 88.975
Contingency		234 050	199,362	2.600	3.700	439.712
	TOTAL INTANGIBLES	3 2,574,545	2,192,982	45,100	40,700	4,853,327
		DRILLING	COMPLETION	PRODUCTION	F101177 60070	TOTAL
TANGIBLI Eurlace Casing	E COSTS	\$ 54 725	COSTS	COSTS	FACILITY COSTS	COSTS \$ 54.725
Intermediate Casing		122.100			-	122 100
Drilling Liner		293 400	***************************************		-	293,400
Production Casing Production Liner		229.875		-		229.875
Tubing		*		52 500		52 500
Wellnead		60,000		40,000	A	100,000
Packers, Liner Hangers		-	35,000	*		36.000
Tanks Production Vessels				50,000	120,000 45,000	95,000
Flow Lines				40,000	40,000	40,000
Rod string			***************************************	*		*
Artificial Lift Equipment Compressor		***************************************	Authoritection	53,000		53,000
Installation Costs		*	-	30,000	90,000	120,000
Surface Pumps				5,000	*	5,000
Non-controllable Surfac Non-controllable Downl		-	Marie Company of the	**************************************	120,000	120,000
Downhole Pumps	iole	*		***************************************	***************************************	
Measurement & Meter I	nstatlation			20,000	19,000	39,000
Gas Conditioning / Deh			-	-		
Interconnecting Facility Gathering / Bulk Lines	Piping				40,000	40,000
Valves, Dumps, Control	llers				40,000	40,000
Tank / Facility Contains					40,000	40,000
Flare Stack Electrical / Grounding			-	7,500	20,000	20,000
Communications / SCA	DA			-	*	4
Instrumentation / Safet			-	10.000	25.000	35,000
	TOTAL TANGIBLE	THE RESERVE THE PARTY OF THE PA	36,000	308,000	529,000	1,633,10
	TOTAL COST		2,228,982	353,100	569,700	5,485,42
REPARED BY MATADO	R PRODUCTION COMP					
Drilling Eng	neer Patrick Walsh	Team Lead - WTX	NN J.T.G.			
Completions Eng	ineer Matt Bell		TO			
Production Eng	ineer. Kenneth Dodson					
ATADOR RESOURCES	COMPANY APPROVAL					The second secon
Executive VP, COO	CFO DEL	VP - Res Enginee	nng		VP - D	riling
Executive VP,		Exec Dir - Explora	5-4-1		VP - Produ	ction
EXECUTIVE VP.	Legal	Exec Dit - Explora	NLF		VP - PTOOL	TWG
Pre	sident	VP & General Mani	iger			
	MAH		RCL		water to the second	
ON OPERATING PART	NER APPROVAL:					
Company t	(ame:	The second secon	Working interest (%)		Ti	ax ID
	**					
Sign	ed by:		Date.			
	Title		Approvai	res		No (mark one)

THE BOTTON OF THE STATES TO A STATE THE STATES AND A STATES OF A STATES AND A STATES OF THE ADMINISTRATION OF