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

APPLICATIONS OF MATADOR PRODUCTION COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

Case Nos. 21994 – 21995, 22010 – 22013

PRE-HEARING STATEMENT

EOG Resources, Inc. ("EOG") hereby submits its Pre-hearing Statement pursuant to the rules of the Oil Conservation Division of the State of New Mexico ("Division" or "OCD").

APPEARANCES

Applicant Attorney
Matador Production Company James Bruce
P.O. Box 1056

Santa Fe, New Mexico 87504

<u>jamesbruc@aol.com</u> (505) 982-2043

Opponent Attorney

EOG Resources, Inc. Jobediah Rittenhouse

Beatty & Wozniak, P.C. 216 16th Place, Suite 1100

Denver, CO 80202

irittenhouse@bwenergylaw.com

(303) 407-4457

STATEMENT OF THE CASE

Matador Production Company ("Matador" or "Applicant") seeks orders pooling all uncommitted interests in the Wolfcamp and Bone Spring Formations underlying standard approximate 320-acre horizonal spacing units in portions of Sections 27, 28, 33, and 34, Township 20 South, Range 29 East, N.M.P.M., Eddy County, New Mexico, as follows:

- In Case No. 21994, Matador seeks to pool the N/2N/2 of Section 33 and the N/2N/2 of Section 34 and initially dedicate this 320-acre spacing unit to the proposed Medford
 3334 Fed. Com. Well No. 201H to a depth sufficient to test the Wolfcamp Formation.
- In Case No. 21995, Matador seeks to pool the S/2N/2 of Section 33 and the S/2N/2 of Section 34 and initially dedicate this 320-acre spacing unit to the proposed Medford
 3334 Fed. Com. Well No. 202H to a depth sufficient to test the Wolfcamp Formation.
- In Case No. 22010, Matador seeks to pool the S/2S/2 of Section 28 and the S/2S/2 of Section 27 and initially dedicate this 320-acre spacing unit to the proposed Ed Drake
 2827 Fed. Com. Well No. 204H to a depth sufficient to test the Wolfcamp Formation.
- In Case No. 22011, Matador seeks to pool the N/2N/2 of Section 28 and the N/2N/2 of Section 27 and initially dedicate this 320-acre spacing unit to the proposed Ed Drake 2827 Fed. Com. Well No. 121H and the Ed Drake 2827 Fed. Com. Well No. 135H to a depth sufficient to test the Bone Spring Formation.
- In Case No. 22012, Matador seeks to pool the S/2N/2 of Section 28 and the S/2N/2 of Section 27 and initially dedicate this 320-acre spacing unit to the proposed Ed Drake 2827 Fed. Com. Well No. 122H and the Ed Drake 2827 Fed. Com. Well No. 136H to a depth sufficient to test the Bone Spring Formation.
- In Case No. 22013, Matador seeks to pool N/2S/2 of Section 28 and the N/2S/2 of Section 27 and initially dedicate this 320-acre spacing unit to the proposed Ed Drake 2827 Fed. Com. Well No. 123H and the Ed Drake 2827 Fed. Com. Well No. 137H to a depth sufficient to test the Bone Spring Formation.

EOG is an owner of an interest in the mineral estate in the lands set forth above. However, to date EOG has not received notice of the applications. Moreover, EOG has mailed well proposals

and will be filing competing pooling applications with the Division covering these lands and formations. The Division has currently set these cases for hearing on August 19, 2021

PROPOSED EVIDENCE

| Witness | Estimated Time | Exhibits |
|--------------------------|-----------------------|----------------------------------|
| Laci Stretcher, Landman | 15 minutes | Approximately six (6) exhibits |
| Brandon Swain, Geologist | 15 minutes | Approximately three (3) exhibits |
| Carlos Sonka, Engineer | 15 minutes | Approximately three (3) exhibits |

PROCEDURAL MATTERS

EOG requests the Division consolidate these cases and further proposes a continuance of the subject cases to December 2, 2021. If EOG is unable to obtain agreement from Matador, EOG will move for a continuance.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: Jobediah Rittenhouse 216 16th St., Suite 1100 Denver, CO 80202 (303) 407-4499

<u>jrittenhouse@bwenergylaw.com</u>

Attorney for EOG Resources, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 12th day of August, 2021, as follows:

James Bruce (jamesbruc@aol.com)
Attorney for Matador Production Company

Josediah Rittenhouse

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone: (575) 748-1283 Fax: (575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 41669

QUESTIONS

| Operator: | OGRID: |
|----------------------------|--|
| MATADOR PRODUCTION COMPANY | 228937 |
| One Lincoln Centre | Action Number: |
| Dallas, TX 75240 | 41669 |
| | Action Type: |
| | [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

| Testimony | | |
|---|----|--|
| Please assist us by provide the following information about your testimony. | | |
| Number of witness | 3 | |
| Testimony time (in minutes) | 45 | |