

**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
Matador Production Company

Attorney
James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
jamesbruc@aol.com
(505) 982-2043

Opponent
EOG Resources, Inc.

Attorney
Jobediah Rittenhouse
Beatty & Wozniak, P.C.
216 16th Place, Suite 1100
Denver, CO 80202
jrittenhouse@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 horizontal 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


<u>Witness</u>	<u>Estimated Time</u>	<u>Exhibits</u>
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
jrittenhouse@bwenergyllaw.com

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


Jobediah 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

District IV
 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 41673

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 41673
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witness	3
Testimony time (in minutes)	45