

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

**APPLICATIONS OF MATADOR PRODUCTION
COMPANY FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 22345, 22346, 22347, & 22348

MATADOR’S CONSOLIDATED PRE-HEARING STATEMENT

Matador Production Company (“Matador”), the applicant in the above-referenced matters, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Matador Production Company

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

APPLICANT’S STATEMENT OF THE CASE

In **Case No. 22345**, Matador seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 SE/4 of Section 30 and W/2 E/2 of Section 31, Township 24 South, Range 36 East, NMPM, Lea County. The spacing unit will be

dedicated to the proposed initial **Bivins Fed Com #137H well**, to be drilled from a surface location in the NW/4 SE/4 (Unit J) of Section 30, to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 31. The completed interval of the well will comply with statewide setbacks for oil wells.

In **Case No. 22346**, Matador seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the E/2 SE/4 of Section 30 and E/2 E/2 of Section 31, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico. The spacing unit will be dedicated to the proposed initial **Bivins Fed Com #138H well**, to be drilled from a surface location in the NW/4 SE/4 (Unit J) of Section 30, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 31. The completed interval of the well will comply with statewide setbacks for oil wells.

In **Case No. 22347**, Matador seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 SE/4 of Section 30 and W/2 E/2 of Section 31, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico. The spacing unit will be dedicated to the proposed initial **Bivins Fed Com #213H well**, to be drilled from a surface location in the NW/4 SE/4 (Unit J) of Section 30, to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 31. The completed interval of the well will comply with statewide setbacks for oil wells.

In **Case No. 22348**, Matador seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the E/2 SE/4 of Section 30 and E/2 E/2 of Section 31, Township 24

South, Range 36 East, NMPM, Lea County, New Mexico. The spacing unit will be dedicated to the proposed initial **Bivins Fed Com #214H well**, to be drilled from a surface location in the NW/4 SE/4 (Unit J) of Section 30, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 31. The completed interval of the well will comply with statewide setbacks for oil wells.

Matador has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject acreage.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
David Johns, Landman	Affidavit	Approx. 8
Andrew Parker, Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Matador requests that these matters be consolidated for hearing and intends to present these cases by affidavit if there is no opposition at the time of hearing. We note that the correct spelling of the well name is “Bivins” not “Bivens.”

Respectfully submitted,

HOLLAND & HART LLP

By: _____

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

**ATTORNEYS FOR MATADOR PRODUCTION
COMPANY**

17782483_v1

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 63651

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 63651
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	2
Testimony time (in minutes)	5