

**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. 22204 & 22205

MATADOR'S CONSOLIDATED PRE-HEARING STATEMENT

Matador Production Company (OGRID No. 228937), the applicant in the above-referenced matters, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Matador Production Company

ATTORNEY

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APPLICANT'S STATEMENT OF THE CASE

Matador seeks orders pooling all uncommitted interests in the Bone Spring formation (Pierce Crossing; Bone Spring [50371]) underlying the following standard 320-acre, more or less, horizontal spacing units in Eddy County, New Mexico:

- In Case 22204, Matador seeks to pool the N/2 S/2 of Section 13, Township 24 South, Range 28 East, and the N/2 S/2 of Section 18, Township 24 South, Range 29 East, and initially dedicate this 320-acre spacing unit to the proposed **(1) the Dr. Ellis #113H well;**

and the (2) the Dr. Ellis #123H well, which are to be drilled from a surface location in the NE/4 SE/4 (Unit I) of Section 14, Township 24 South, Range 28 East, to a bottom hole location in the NE/4 SE/4 (Unit I) of said Section 18.

- In Case 22205, Matador seeks to pool the S/2 S/2 of Section 13, Township 24 South, Range 28 East, and the S/2 S/2 of Section 18, Township 24 South, Range 29 East, and initially dedicate this 320-acre spacing unit to the proposed initial **Kathy Kregor Fed Com #114H well**, to be drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 14, Township 24 South, Range 28 East, to a bottom hole location in the SE/4 SE/4 (Unit P) of said Section 18.

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 |
|---------------------------------------|-----------------------|-----------------|
| Hanna Bollenbach, Landman | Affidavit | Approx. 6 |
| Andrew Parker, Geologist | Affidavit | Approx. 3 |

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.

Respectfully submitted,

HOLLAND & HART LLP

By:  _____

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

QUESTIONS

Action 76177

QUESTIONS

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| Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240 | OGRID: 228937 |
| | Action Number: 76177 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

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| Testimony | |
| <i>Please assist us by provide the following information about your testimony.</i> | |
| Number of witnesses | <i>Not answered.</i> |
| Testimony time (in minutes) | <i>Not answered.</i> |