

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

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

CASE NOS. 22801

MATADOR’S PRE-HEARING STATEMENT

Matador Production Company (“Matador”), 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

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paul M. Vance
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
pmvance@hollandhart.com

OTHER PARTIES

NONE

ATTORNEY

APPLICANT’S STATEMENT OF THE CASE

Matador seeks an order pooling all uncommitted interests in the Strawn formation [Shipp; Strawn (Pool Code 55695)] underlying a standard 80-acre well spacing unit comprised of the N/2 NW/4 of Section 1, Township 17 South, Range 37 East, NMPM, Lea County, New Mexico.

Applicant proposes to dedicate the above-referenced spacing unit to the **Julie 01-17S-37E #1**, a directional well to be drilled and completed at a non-standard bottom-hole location in the NW/4 NW/4 (Unit D) of Section 1. The special pool rules issued under Order No. R-8062, *et. seq.*, for the Shipp; Strawn, Pool require 80-acre spacing and for wells to be located within 150 feet of the center of a governmental quarter-quarter section. The non-standard location for the proposed well is necessary to efficiently and effectively drain the targeted reservoir, and Applicant will separately seek administrative approval for the proposed non-standard location.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Reece Clark, Landman	Affidavit	Approx. 5
Andrew Parker, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

Matador intends to present this case by affidavit if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paul M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

**ATTORNEYS FOR MATADOR PRODUCTION
COMPANY**

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 111376

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 111376
	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)	8