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

## APPLICATION OF MATADOR PRODUCTION COMPANY FOR APPROVAL OF AN OVERLAPPING HORIZONTAL WELL SPACING UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. \_\_\_\_\_\_ (formerly Case No. 22479)

## **APPLICATION**

Matador Production Company, ("Matador"), through its undersigned attorneys, hereby files this application with the Oil Conservation Division for an order (a) approving a 390.48-acre, more or less, horizontal well spacing unit in the Bone Spring formation comprised of Lots 5-8 of Sections 1 and 2, T-21-S, R-28-E, and Lots 5-6 of Section 6, T-21-S, R-29-E, NMPM, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. In support of this application, Matador states:

1. An affiliate of Matador Production Company (OGRID No. 228937) is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon.

2. Matador seeks to dedicate the above-referenced horizontal spacing unit to the proposed **Simon Camamile 0206 Fed Com #112H** and **#122H** wells to be drilled from a surface location within Lot 5 of Section 2, T-21-S, R-28-E to a bottom hole location within Lot 6 of Section 6, T-21-S, R-29-E.

3. This 390.48-acre horizontal well spacing unit will overlap a 670.38 acre, more or less, horizontal well spacing unit in the Bone Spring formation comprised of Lots 1-8 of Sections

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1 and 2, Township 21 South, Range 28 East, and Lots 3-6 of Section 6, Township 21 South, Range29 East, to be dedicated to the proposed Simon Camamile 0206 Fed Com #132H well.

4. Matador has sought and been unable to obtain voluntary agreement for the development of these lands from all the mineral interest owners in the subject spacing unit.

5. Approval of this overlapping horizontal well spacing unit and the pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

WHEREFORE, Matador requests that this application be set for hearing before an Examiner of the Oil Conservation Division on July 7, 2022, and, after notice and hearing as required by law, the Division enter an order:

- A. Approving the overlapping horizontal well spacing unit and pooling all uncommitted interests therein;
- B. Designating Matador Production Company operator of this spacing unit and the horizontal well to be drilled thereon;
- C. Authorizing Matador to recover its costs of drilling, equipping and completing the well;
- D. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- E. Imposing a 200% penalty for the risk assumed by Matador in drilling and completing the well against any working interest owner who does not voluntarily participate in the drilling of the well.

Respectfully submitted,

## HOLLAND & HART LLP

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