

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

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

CASE NOS. 22912-22917

MATADOR'S CONSOLIDATED 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

Mewbourne Oil Company

ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
505-982-2043
jamesbruc@aol.com

COG Operating LLC and
Concho Oil & Gas Operating LLC

Ocean Munds-Dry
Elizabeth Ryan
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
Ocean.Munds-Dry@conocophillips.com
Beth.Ryan@conocophillips.com

APPLICANT'S STATEMENT OF THE CASE

Matador seeks orders approving and then pooling overlapping horizontal well spacing units in the Bone Spring and Wolfcamp formations underlying the S/2 of irregular Sections 1 and 2, Township 21 South, Range 28 East, and the SW/4 equivalent of irregular Section 6, Township 21 South, Range 29 East, NMPM, Eddy County, New Mexico, as follows:

- **Case 22912** seeks approval and pooling of an overlapping 390.36-acre horizontal well spacing unit in the Bone Spring formation comprised of the N/2 SW/4 and N/2 SE/4 of Sections 1 and 2, and Lot 17 and NE/4 SW/4 of Section 6, to be initially dedicated to the to the proposed **Simon Camamile 0206 Fed Com 115H and 125H** wells to be drilled from a surface location within the SW/4 SW/4 of Section 2 to a bottom hole location within NE/4 SW/4 of Section 6. This 390.36-acre horizontal well spacing unit will overlap a proposed 780.68-acre horizontal well spacing unit in the Bone Spring formation comprised of S/2 of Sections 1 and 2, and Lots 17-18, NE/4 SW/4 and SE/4 SW/4 of Section 6, to be dedicated to the proposed Simon Camamile 0206 Fed Com 136H well.
- **Case 22913** seeks approval and pooling of an overlapping 390.32-acre horizontal well spacing unit in the Bone Spring formation comprised of the S/2 SW/4 and S/2 SE/4 of Sections 1 and 2, and Lot 18 and SE/4 SW/4 of Section 6, to be initially dedicated to the to the proposed **Simon Camamile 0206 Fed Com 116H and 126H** wells to be drilled from a surface location within the SW/4 SW/4 of Section 2 to a bottom hole location within SE/4 SW/4 of Section 6. This 390.32-acre horizontal well spacing unit will overlap a proposed 780.68-acre horizontal well spacing unit in the Bone Spring formation comprised of S/2 of Sections 1 and 2, and Lots 17-18, NE/4 SW/4 and SE/4 SW/4 of Section 6, to be dedicated to the proposed Simon Camamile 0206 Fed Com 136H well.
- **Case 22914** seeks approval and pooling of an overlapping 780.68-acre horizontal well spacing unit in the Bone Spring formation comprised of the S/2 of Sections 1 and 2, and Lots 17-18, NE/4 SW/4 and SE/4 SW/4 of Section 6, to be initially dedicated to the proposed **Simon Camamile 0206 Fed Com 136H** well to be drilled from a surface location within the SW/4 SW/4 of Section 2 to a bottom hole location within NE/4 SW/4 of Section 6. This 780.68-acre horizontal well spacing unit will overlap (a) a 390.36-acre horizontal well spacing unit comprised of the N/2 SW/4 and N/2 SE/4 of Sections 1 and 2, and Lot 17 and the NE/4 SW/4 of Section 6, to be dedicated to the proposed Simon Camamile 0206

Fed Com 115H and 125H wells, and (b) a 390.32-acre horizontal well spacing unit comprised of the S/2 SW/4 and S/2 SE/4 of Sections 1 and 2, and Lot 18 and SE/4 SW/4 of Section 6, to be dedicated to the proposed Simon Camamile 0206 Fed Com 116H and 126H wells.

- **Case 22915** seeks approval and pooling of an overlapping 390.36-acre horizontal well spacing unit in the Wolfcamp formation comprised of the N/2 SW/4 and N/2 SE/4 of Sections 1 and 2, and Lot 17 and NE/4 SW/4 of Section 6, to be initially dedicated to the to the proposed **Simon Camamile 0206 Fed Com 205H** well to be drilled from a surface location within the SW/4 SW/4 of Section 2 to a bottom hole location within NE/4 SW/4 of Section 6. This 390.36-acre horizontal well spacing unit will overlap a proposed 780.68-acre horizontal well spacing unit in the Wolfcamp formation comprised of S/2 of Sections 1 and 2, and Lots 17-18, NE/4 SW/4 and SE/4 SW/4 of Section 6, to be dedicated to the proposed Simon Camamile 0206 Fed Com 226H well.
- **Case 22916** seeks approval and pooling of an overlapping 390.32-acre horizontal well spacing unit in the Wolfcamp formation comprised of the S/2 SW/4 and S/2 SE/4 of Sections 1 and 2, and Lot 18 and SE/4 SW/4 of Section 6, to be initially dedicated to the to the proposed **Simon Camamile 0206 Fed Com 206H** well to be drilled from a surface location within the SW/4 SW/4 of Section 2 to a bottom hole location within SE/4 SW/4 of Section 6. This 390.32-acre horizontal well spacing unit will overlap a proposed 780.68-acre horizontal well spacing unit in the Bone Spring formation comprised of S/2 of Sections 1 and 2, and Lots 17-18, NE/4 SW/4 and SE/4 SW/4 of Section 6, to be dedicated to the proposed Simon Camamile 0206 Fed Com 226Hwell.
- **Case 22917** seeks approval and pooling of an overlapping 780.68-acre horizontal well spacing unit in the Wolfcamp formation comprised of the S/2 of Sections 1 and 2, and Lots 17-18, NE/4 SW/4 and SE/4 SW/4 of Section 6, to be initially dedicated to the proposed **Simon Camamile 0206 Fed Com 226H** well to be drilled from a surface location within the SW/4 SW/4 of Section 2 to a bottom hole location within NE/4 SW/4 of Section 6. This 780.68-acre horizontal well spacing unit will overlap (a) a 390.36-acre horizontal well spacing unit comprised of the N/2 SW/4 and N/2 SE/4 of Sections 1 and 2, and Lot 17 and the NE/4 SW/4 of Section 6, to be dedicated to the proposed Simon Camamile 0206 Fed Com 205H well, and (b) a 390.32-acre horizontal well spacing unit comprised of the S/2 SW/4 and S/2 SE/4 of Sections 1 and 2, and Lot 18 and SE/4 SW/4 of Section 6, to be dedicated to the proposed Simon Camamile 0206 Fed Com 206H well.

Applicant has diligently sought but been unable to obtain voluntary agreement for the development of these lands from all mineral interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Chris Carleton, Landman	Affidavit	Approx. 8
Andrew Parker, Geologist	Affidavit	Approx. 6

PROCEDURAL MATTERS

Matador requests that these cases be consolidated for hearing and intends to present them 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**

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
505-982-2043
jamesbruc@aol.com

Attorney for Mewbourne Oil Company

Ocean Munds-Dry
Elizabeth Ryan
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
Ocean.Munds-Dry@conocophillips.com
Beth.Ryan@conocophillips.com

**Attorneys for COG Operating LLC and
Concho Oil & Gas LLC**



Michael H. Feldewert

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 138062

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 138062
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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>