# 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**

# <u>APPLICANT</u> <u>ATTORNEY</u>

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#### 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 <u>Bone Spring</u> 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 <u>Bone Spring</u> 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 <u>Bone Spring</u> 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** 

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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:

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QUESTIONS

Action 138069

#### **QUESTIONS**

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	138069
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

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