

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

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

CASE NO. 22983

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

CASE NO. 22984

MATADOR’S CONSOLIDATED PRE-HEARING STATEMENT

Matador Production Company (“Matador” or “Applicant”), the applicant in the above-referenced matters, submits this Consolidated 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

Under these consolidated cases, Matador seeks orders pooling all uncommitted interests in the Bone Spring formation (WC-025 G-07 S223505N; BONE SPRING [98136]) underlying the referenced acreage all in Township 23 South, Range 35 East, NMPM, Lea County, New Mexico, as follows:

- Under **Case 22983**, Matador seeks to pool a standard 400-acre, more or less, horizontal spacing unit comprised of the W/2 SW/4 of Section 4 and the W/2 W/2 of Sections 9 and 16 and initially dedicate this Bone Spring spacing unit to the proposed **Marlan Downey State Com #121H well**, to be drilled from a surface location in the N/2 SW/4 of Section 4 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 16. This 400-acre horizontal well spacing unit will overlap the following existing horizontal well spacing units covering portions of the subject acreage:
 - A 159.97-acre, more or less, horizontal well spacing unit comprised of the W/2 W/2 of Section 9, Township 23 South, Range 35 East, dedicated to the Marlan Downey State 09-23S-35E AR #111H well (API: 30-025-44201); and
 - A 160.09-acre, more or less, horizontal well spacing unit comprised of the W/2 W/2 of Section 16, Township 23 South, Range 35 East, dedicated to the Pegasus 23-35-16 State #251H well (API: 30-025-44199).
- Under **Case 22984**, Matador seeks to pool a standard 400-acre, more or less, horizontal spacing unit comprised of the E/2 SW/4 of Section 4 and the E/2 W/2 of Sections 9 and 16 and initially dedicate this Bone Spring spacing unit to the proposed **Marlan Downey**

State Com #122H well, to be horizontally drilled from a surface location in the N/2 SW/4 of Section 4 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 16.

The completed interval for each of the wells will comply with statewide setbacks for oil wells. 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
Sara Hartsfield, Landman	Affidavit	Approx. 7
Blake Herber, Geologist	Affidavit	Approx. 4

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 138161

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 138161
	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>