

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

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

CASE NOS. 22745-22746

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
("Matador")

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula 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

Marathon Oil Permian LLC

Deana M. Bennett
Bryce H. Smith
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
(505) 848-1800
deana.bennett@modrall.com
bryce.smith@modrall.com

APPLICANT’S STATEMENT OF THE CASE

Under these consolidated cases, Matador seeks orders pooling all uncommitted interests in the Bone Spring formation [Gem; Bone Spring (Pool Code 27220)] and underlying the referenced acreage all in Township 20 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

- Under **Case 22745**, Matador seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 4 and 9 and initially dedicate this Bone Spring spacing unit to the proposed **Silver Federal Com 114H** and **Silver Federal Com 124H** wells, both to be drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 9, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 4.
- Under **Case 22746**, Matador seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Sections 4 and 9 and initially dedicate this Bone Spring spacing unit to the proposed **Silver Federal Com 403H** and **Silver Federal Com 504H** wells, both to be drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 9, to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 4.

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
Isaac Evans, Landman	Affidavit	Approx. 6
Andrew Parker, 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:  _____

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula 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 December 8, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Deana M. Bennett
Bryce H. Smith
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
(505) 848-1800
deana.bennett@modrall.com
bryce.smith@modrall.com

Attorneys for Marathon Oil Permian LLC



Paula M. Vance

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 165596

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 165596
	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)	<i>Not answered.</i>