

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

**APPLICATIONS OF MATADOR PRODUCTION  
COMPANY FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NOS. 23248–23250**

**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

**APPLICANT’S STATEMENT OF THE CASE**

Under these consolidated cases, Matador seeks orders pooling all uncommitted interests in the Bone Spring (Culebra Bluff; Bone Spring, South [15011]) and Wolfcamp (Purple Sage; Wolfcamp (Gas) [98220]) underlying the referenced acreage all in Township 22 South, Range 28 East, NMPM, Eddy County, New Mexico, as follows:

- Under **Case No. 23248**, Matador seeks to pool a standard 320-acre, more or less, horizontal well spacing unit comprised of the N/2 N/2 of Sections 27 and 28 and initially dedicate this Bone Spring spacing unit to the proposed **Charlie K.S. 2827 Fed Com #121H** well, to be horizontally drilled from a surface location in the NE/4 of Section 29 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 27.
- Under **Case No. 23249**, Matador seeks to pool a standard 320-acre, more or less, horizontal well spacing unit comprised of the S/2 N/2 of Sections 27 and 28 and initially dedicate this Bone Spring spacing unit to the proposed **Charlie K.S. 2827 Fed Com #122H** well, to be horizontally drilled from a surface location in the NE/4 of Section 29 to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 27.
- Under **Case No. 23250**, Matador seeks to pool a standard 640-acre, more or less, horizontal well spacing unit comprised of the N/2 of Sections 27 and 28 and initially dedicate this Wolfcamp spacing unit to the proposed:
  - **Charlie K.S. 2827 Fed Com #201H** well, to be horizontally drilled from a surface location in the NE/4 of Section 29 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 27; and
  - **Charlie K.S. 2827 Fed Com #202H** well, to be horizontally drilled from a surface location in the NE/4 of Section 29 to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 27.

The completed interval for each of the wells will comply with statewide setbacks for the oil wells and the Purple Sage Special Pool rules for the gas 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**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Hanna Bollenbach, Landman	Affidavit	Approx. 7
Dan Brugioni, Geologist	Affidavit	Approx. 6

**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**

**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 175572

**QUESTIONS**

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 175572
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>