

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

**APPLICATIONS OF MATADOR PRODUCTION COMPANY FOR APPROVAL OF
OVERLAPPING SPACING UNITS AND COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

CASE NOS. 22915 & 22916

**APPLICATIONS OF MATADOR PRODUCTION COMPANY FOR APPROVAL OF
NON-STANDARD SPACING UNITS AND COMPULSORY POOLING, EDDY
COUNTY, NEW MEXICO.**

CASE NOS. 22990 & 22992

MATADOR’S AMENDED 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
Joby Rittenhouse
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
Ocean.Munds-Dry@conocophillips.com
Beth.Ryan@conocophillips.com
Joby.rittenhouse@conocophillips.com

EOG Resources, Inc.

Jordan L. Kessler
EOG RESOURCES, INC.
125 Lincoln Avenue, Suite 213
Santa Fe, New Mexico 87501
(432) 488-6108
Jordan_kessler@eogresources.com

APPLICANT’S STATEMENT OF THE CASE

Matador seeks orders approving and then pooling horizontal well spacing units in the Wolfcamp formation underlying irregular Sections 1 and 2, Township 21 South, Range 28 East, and the E2 equivalent of irregular Section 6, Township 21 South, Range 29 East, NMPM, Eddy County, New Mexico, as follows:

- Case 22990 seeks an order approving and then pooling a non-standard 670.38 acre horizontal well spacing unit in the Wolfcamp formation comprised of Lots 1-8 (N2N2 equivalent) of irregular Sections 1 and 2, Township 21 South, Range 28 East, and Lots 3-6 (N2NW4 equivalent) of irregular Section 6, Township 21 South, Range 29 East, NMPM, Eddy County, New Mexico. This proposed non-standard spacing unit will be initially dedicated to the following proposed wells:
 - **Simon Camamile 0206 Fed Com 201H** and the **Simon Camamile 0206 Fed Com 222H** to be drilled from a surface location within Lot 5 of irregular Section 2 to proposed bottom hole locations within Lot 3 of irregular Section 6; and
 - **Simon Camamile 0206 Fed Com 202H** to be drilled from a surface location within Lot 5 of irregular Section 2 to a proposed bottom hole location within Lot 6 of irregular Section 6. This proposed non-standard spacing unit is the equivalent of the N/2 N/2 of these irregular sections and will be initially dedicated to the following proposed wells:

- Case 22992 seeks an order approving and then pooling a non-standard 780.84 acre horizontal well spacing unit in the Wolfcamp formation comprised of Lots 9-16 (S2S2 equivalent) of irregular Sections 1 and 2, Township 21 South, Range 28 East, and Lots 11-14 (S2NW4 equivalent) of irregular Section 6, Township 21 South, Range 29 East, NMPM, Eddy County, New Mexico. This proposed non-standard spacing unit will be initially dedicated to the following proposed wells:
 - **Simon Camamile 0206 Fed Com 203H** and the **Simon Camamile 0206 Fed Com 224H** to be drilled from a surface location within Lot 13 of irregular Section 2 to bottom hole locations within Lot 11 of irregular Section 6
 - **Simon Camamile 0206 Fed Com 204H** to be drilled from a surface location within Lot 13 of irregular Section 2 to a bottom hole location within Lot 14 of irregular Section 6.
- Case 22915 seeks to pool a standard 390.36-acre horizontal well spacing unit in the Wolfcamp formation comprised of the N2S2 of Sections 1 and 2, and Lot 17 and NE4SW4 of Section 6, to be initially dedicated to the proposed **Simon Camamile 0206 Fed Com 205H** well to be drilled from a surface location within the SW4SW4 of Section 2 to a bottom hole location within NE4SW4 of Section 6.
- Case 22916 seeks to pool a standard 390.32-acre horizontal well spacing unit in the Wolfcamp formation comprised of the S2S2 of Sections 1 and 2, and Lot 18 and SE4SW4 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 SW4SW4 of Section 2 to a bottom hole location within SE4SW4 of Section 6.

The proposed non-standard spacing units sought under Cases 22990 and 22992 are necessitated by the unique land configuration presented by the government lots comprising the subject area. The contiguous series of lots comprising the non-standard spacing unit sought under Case 22990 represent the N2N2 equivalent of irregular sections 1 and 2 and the N2NW4 equivalent of irregular Section 6. The contiguous series of lots comprising the non-standard spacing unit sought under Case 22992 represent the S2N2 equivalent of irregular sections 1 and 2, and the S2NW4 equivalent of irregular Section 6. Applicant has 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

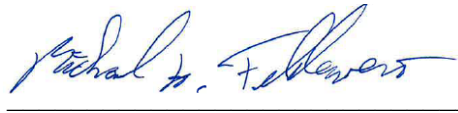
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Clay Wooten, Landman	Affidavit	Approx. 8
Andrew Parker, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Matador no longer requires approval of an overlapping spacing unit for the wells at issue under Cases 22915 and 229126. 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 February 9, 2023 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
Joby Rittenhouse
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
Ocean.Munds-Dry@conocophillips.com
Beth.Ryan@conocophillips.com
Joby.Rittenhouse@conocophillips.com

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

Jordan L. Kessler
EOG RESOURCES, INC.
125 Lincoln Avenue, Suite 213
Santa Fe, New Mexico 87501
(432) 488-6108
Jordan_kessler@eogresources.com

Attorney for EOG Resources, Inc.



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 184630

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 184630
	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>