

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

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

CASE NO. 23243

MATADOR'S PRE-HEARING STATEMENT

Matador Production Company ("Matador" or "Applicant"), the applicant in the above-referenced matter, submits this 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

Fasken Oil & Ranch ("Fasken")

Sharon T. Shaheen
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshhaeen@montand.com

Carl Farley’s Boys Ranch Foundation

Leslie Weaver
Amarillo National Bank, Agent
P.O. Box 1
Amarillo, TX 79105
(806) 378-8360
Leslie.weaver@anb.com

APPLICANT’S STATEMENT OF THE CASE

In this case, Matador seeks an order pooling all uncommitted interests in the Strawn formation (Humble City; Strawn, South [Pool Code 33500]) underlying a standard 80-acre spacing unit comprised of the W/2 NE/4, Township 17 South, Range 37 East, NMPM, Lea County, New Mexico. Applicant proposes to dedicate the above-referenced spacing unit to the proposed **Rey B 13-17S-37E #1** well, a directional well to be drilled and completed at a non-standard bottom-hole location in the NW/4 NE/4 (Unit B) of Section 13. Special pool rules issued under Order No. R-6913, et. seq., for the Humble City; Strawn, South, Pool requires 80-acre spacing and for wells to be located within 150 feet of the center of a governmental quarter-quarter section. Applicant will separately seek administrative approval for the proposed non-standard location. The non-standard location for the proposed well is necessary to efficiently and effectively drain the targeted reservoir.

APPLICANT’S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|---------------------------------------|-----------------------|-----------------|
| Reece Clark, Landman | Affidavit | Approx. 6 |
| Andrew Parker, Geologist | Affidavit | Approx. 4 |

PROCEDURAL MATTERS

Matador intends to present this case 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 March 9, 2023, I served a copy of the foregoing document via Electronic Mail to the following counsel/parties of record:

Sharon T. Shaheen
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshahen@montand.com

Attorney for Fasken Oil & Ranch

Leslie Weaver
Amarillo National Bank, Agent
P.O. Box 1
Amarillo, TX 79105
(806) 378-8360
Leslie.weaver@anb.com

Carl Farley's Boys Ranch Foundation



Adam G. Rankin

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 195365

QUESTIONS

| | |
|---|--|
| Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240 | OGRID: 228937 |
| | Action Number: 195365 |
| | 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> |