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

APPLICATION OF MATADOR PRODUCTION COMPANY FOR APPROVAL OF A NON-STANDARD HORIZONTAL WELL SPACING UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 22991

MATADOR'S PRE-HEARING STATEMENT

Matador Production Company ("Matador"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

<u>APPLICANT</u> <u>ATTORNEY</u>

Matador Production Company 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 agrankin@hollandhart.com jbroggi@hollandhart.com pmvance@hollandhart.com

OTHER PARTIES <u>ATTORNEY</u>

Mewbourne Oil Company 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 an order approving and then pooling a non-standard 780.84-acre horizontal well spacing unit in the Bone Spring formation [WC-015 G-05 S202935P; Bone Spring (Pool Code 97995)] comprised of Lots 9-16 of irregular Sections 1 and 2, Township 21 South, Range 28 East, and Lots 11-14 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 113H, the Simon Camamile 0206 Fed Com 123H, and the Simon Camamile 0206 Fed Com 134H wells to be drilled from a surface location within Lot 13 of irregular Section 2, T-21-S, R-28-E to proposed bottom hole locations within Lot 11 of irregular Section 6, T-21-S, R-29-E, and
- Simon Camamile 0206 Fed Com 114H and Simon Camamile 0206 Fed Com 124H wells to be drilled from a surface location within Lot 13 of irregular Section 2, T-21-S, R-28-E to proposed bottom hole locations within Lot 14 of irregular Section 6, T-21-S, R-29-E.

The proposed non-standard spacing unit sought in this matter is 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 this matter represent the S2N2

equivalent of irregular sections 1 and 2 and the S2NW4 equivalent of irregular Section 6. A similar order has been issued for the Wolfcamp formation underlying this acreage under Case 22992, Order R-22654.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Clay Wooten, Landman	Affidavit	Approx. 10
Andrew Parker, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Matador does not anticipate any opposition as the hearing and intend to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Paul M. Vance

Post Office Box 2208

Santa Fe, NM 87504

505-988-4421

505-983-6043 Facsimile

mfeldewert@hollandhart.com

agrankin@hollandhart.com

jbroggi@hollandhart.com

pmvance@hollandhart.com

ATTORNEYS FOR MATADOR PRODUCTION COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 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

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 234462

QUESTIONS

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	234462
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	