

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

**APPLICATION OF MRC PERMIAN  
COMPANY FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 23607**

**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**

**APPLICANT**

Matador Production Company

**ATTORNEY**

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**OTHER PARTIES**

**ATTORNEY**

**APPLICANT’S STATEMENT OF THE CASE**

Matador seeks an order an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 240-acre, more or less, horizontal well spacing unit comprised of the W/2 W/2 of Section 20 and the W/2 NW/4 of Section 29, Township 26 South, Range 35 East, NMPM, Lea County, New Mexico. Matador seeks to initially dedicate the above-referenced

horizontal spacing unit to the proposed Grevey Com #111H, Grevey Com #121H, and Grevey Com #131H wells, all to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 20 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 29.

Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject spacing unit. The pooling of interests will allow Applicant to obtain a just and fair share of the oil and gas underlying the subject lands, avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
David Johns, Landman	Affidavit	Approx. 8
Blake Herber, Geologist	Affidavit	Approx. 4

**PROCEDURAL MATTERS**

Matador does not anticipate any opposition to this matter and intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By:  \_\_\_\_\_

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
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QUESTIONS

Action 234640

**QUESTIONS**

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 234640
	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	Not answered.
Testimony time (in minutes)	Not answered.