

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

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

**Case Nos. 21063 - 21065**

**APPLICATIONS OF OSTRICH OIL AND GAS LLC  
FOR COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

**Case No. 20988 & 20989**

**CONSOLIDATED PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Matador Production Company as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Matador Production Company  
Suite 1500  
5400 LBJ Freeway  
Dallas, Texas 75240

Attention: Kyle Perkins

**OPPONENT**

Ostrich Oil and Gas LLC

ConocoPhillips Company

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT'S ATTORNEY**

Ernest L. Padilla

Holland & Hart LLP

**STATEMENT OF THE CASE**

**APPLICANT**

Case 21063: Applicant seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 3 and W/2W/2 of Section 10, Township 22 South, Range 32 East, NMPM. The unit will be dedicated to the Nina Cortell Well Nos. 125H and 131H, with first take points in the NW/4NW/4 of Section 3 and final take points in the SW/4SW/4 of Section 25. Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and

charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

Case 21064: Applicant seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the E/2W/2 of Section 3 and E/2W/2 of Section 10, Township 22 South, Range 32 East, NMPM. The unit will be dedicated to the Nina Cortell Well Nos. 126H, 132H, and 112H, with first take points in the NE/4NW/4 of Section 3 and final take points in the SE/4SW/4 of Section 25. Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

Case 21065: Applicant seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the E/2W/2 of Section 3 and E/2W/2 of Section 10, Township 22 South, Range 32 East, NMPM. The unit will be dedicated to the Nina Cortell Well No. 202H, with a first take point in the NE/4NW/4 of Section 3 and a final take point in the SE/4SW/4 of Section 25. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well.

OPPONENT

Ostrich Oil and Gas LLC has competing applications in Case Nos. 20988 and 20989.

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Chris Carleton (landman)	15 minutes	Approx. 4
Andrew Parker (geologist)	15 minutes	Approx. 10

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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**PROCEDURAL MATTERS**

The parties are close to settling this matter. If so, the cases will be presented by affidavit.

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Matador Production Company

CERTIFICATE OF SERVICE

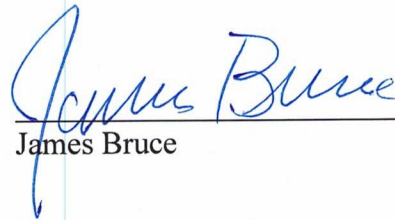
I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 10<sup>th</sup> day of June, 2021 by e-mail:

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