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

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

CASE NOS. 22052-22053

MATADOR'S 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 ATTORNEY

Matador Production Company Michael H. Feldewert

Adam G. Rankin Julia Broggi Kaitlyn A. Luck 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 kaluck@hollandhart.com

Marathon Oil Permian Deanna M. Bennett

Modrall, Sperling, Roehl, Harris & Sisk, P.A.

P.O. Box 2168

500 Fourth Street NW, Suite 1000 Albuquerque, NM 87103-2168 (505) 848-1800 PHONE

dmb@modrall.com

APPLICANT'S STATEMENT OF THE CASE

Matador seeks orders pooling all uncommitted interests in the Bone Spring formation [Malaga; Bone Spring (Pool code 42780)] underlying standard 320-acre, more or less, horizontal

spacing units in Sections 14 and 15, Township 24 South, Range 28 East, Eddy County, New Mexico as follows:

- Under Case 22052 Matador seeks to pool the N/2 N/2 of Sections 14 and 15 and initially dedicate this 320-acre spacing unit to the proposed Bubba Burton Com #111H and the Bubba Burton Com #121H wells to be drilled from surface locations in the NE/4 NE/4 (Unit A) of Section 14 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 15.
- Under Case 22053 Matador seeks to pool the S/2 N/2 of Sections 14 and 15 and initially dedicate this 320-acre spacing unit to the proposed the Ken Wilson Com #112H and the Ken Wilson Com #122H wells to be drilled from surface locations in the SE/4 NE/4 (Unit H) of Section 14 to bottom hole locations in the SW/4 NW/4 (Unit E) of Section 15.

Matador has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

ECTIMATED TIME

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Robert Helbing, Landman	Affidavit	Approx. 6
Daniel Brugioni, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

Matador requests that these matters be consolidated for hearing and intends to present these cases by affidavit if there is no opposition at the time of hearing.

XXXXXXXXXX

Respectfully submitted,

HOLLAND & HART LLP

By:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

ATTORNEYS FOR MATADOR PRODUCTION COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2021, I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

Deanna M. Bennett Modrall, Sperling, Roehl, Harris & Sisk, P.A. P.O. Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, NM 87103-2168 (505) 848-1800 PHONE dmb@modrall.com

Attorney for Marathon Oil Permian

Kaitlyn A. Luck

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 38853

QUESTIONS

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	38853
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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