# 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. 22269, 22270, 22271, and 22272

## 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 5400 LBJ Freeway, Suite 1500 Dallas, Texas 75240 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

# **APPLICANT'S STATEMENT OF THE CASE**

Under these consolidated cases, Matador seeks orders pooling all uncommitted interests in the Bone Spring formation (WC-025 G-08 S253534O; BONE SPRING [97088]) and Wolfcamp formation (JAL; WOLFCAMP, WEST [33813]) underlying the referenced acreage all in Township 24 South, Range 36 East, NMPM, Lea County, New Mexico, as follows:

• Under Case 22269, Matador seeks to pool a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 SW/4 of Section 30 and W/2 W/2 of Section 31 and

initially dedicate this Bone Spring spacing unit to the proposed **Weinberger Fed Com** #135H well, to be drilled from a surface location in the SW/4 NW/4 (Unit E) of Section 30, to a bottom hole location in the SW/4 SW/4 (Unit M) of said Section 31.

- Under Case 22270, Matador seeks to pool a standard 240-acre, more or less, horizontal spacing unit comprised of the E/2 SW/4 of Section 30 and E/2 W/2 of Section 31, and initially dedicate this Bone Spring spacing unit to the proposed Weinberger Fed Com #136H well, to be drilled from a surface location in the SW/4 NW/4 (Unit E) of Section 30, to a bottom hole location in the SE/4 SW/4 (Unit N) of said Section 31.
- Under Case 22271, Matador seeks to pool a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 SW/4 of Section 30 and W/2 W/2 of Section 31, and initially dedicate this Wolfcamp spacing unit to the proposed Weinberger Fed Com #211H well, to be drilled from a surface location in the SW/4 NW/4 (Unit E) of Section 30, to a bottom hole location in the SW/4 SW/4 (Unit M) of said Section 31.
- Under Case 22272, Matador seeks to pool a standard 240-acre, more or less, horizontal spacing unit comprised of the E/2 SW/4 of Section 30 and E/2 W/2 of Section 31, and initially dedicate this Wolfcamp spacing unit to the proposed Weinberger Fed Com #212H well, to be drilled from a surface location in the SW/4 NW/4 (Unit E) of Section 30, to a bottom hole location in the SE/4 SW/4 (Unit N) of said Section 31.

The completed interval for each of the wells will comply with statewide setbacks for oil wells. 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

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
David Johns, Landman	Affidavit	Approx. 6
Andrew Parker, Geologist	Affidavit	Approx. 4

## **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.

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** 

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 58488

#### **QUESTIONS**

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	58488
	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.	