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

APPLICATION OF MATADOR PRODUCTION COMPANY FOR COMPULSORY POOLING, LEA, NEW MEXICO.

CASE NOS. 22747 & 22748

MATADOR'S CONSOLIDATED PRE-HEARING STATEMENT

Matador Production Company ("Matador" or "Applicant"), the applicant in the abovereferenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

Matador Production Company ("Matador")

Michael H. Feldewert Adam G. Rankin Julia Broggi Paula 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

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, Matador seeks orders pooling all uncommitted interests in the Bone Spring formation (Teas; Bone Spring, West [96399]) and underlying the referenced acreage all in Township 20 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

- Under Case 22747, Matador seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Sections 16 and 21 and initially dedicate this Bone Spring spacing unit to the proposed Pony Express Federal Com 403H, the Pony Express Federal Com 504H and the Pony Express Federal Com 603H wells, to be drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 16, to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 21.
- Under Case 22748, Matador seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 16 and 21 and initially dedicate this Bone Spring spacing unit to the proposed Pony Express Federal Com 404H, the Pony Express Federal Com 505H, and the Pony Express Federal Com 604H wells, to be drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 16, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 21.

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	
Isaac Evans, 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
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
pmvance@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 125610

QUESTIONS

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	125610
	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.	