# 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. 22745-22746** 

# 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

#### **OTHER PARTIES**

Marathon Oil Permian LLC

Deana M. Bennett Bryce H. Smith

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

Post Office Box 2168

500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168

(505) 848-1800

deana.bennett@modrall.com bryce.smith@modrall.com

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

Under these consolidated cases, Matador seeks orders pooling all uncommitted interests in the Bone Spring formation [Gem; Bone Spring (Pool Code 27220)] and underlying the referenced acreage all in Township 20 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

- Under Case 22745, Matador seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 4 and 9 and initially dedicate this Bone Spring spacing unit to the proposed Silver Federal Com 114H and Silver Federal Com 124H wells, both to be drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 9, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 4.
- Under Case 22746, Matador seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Sections 4 and 9 and initially dedicate this Bone Spring spacing unit to the proposed Silver Federal Com 403H and Silver Federal Com 504H wells, both to be drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 9, to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 4.

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

ATTORNEYS FOR MATADOR PRODUCTION COMPANY

pmvance@hollandhart.com

# **CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Deana M. Bennett
Bryce H. Smith
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
(505) 848-1800
deana.bennett@modrall.com
bryce.smith@modrall.com

**Attorneys for Marathon Oil Permian LLC** 

Paula M. Vance

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 165579

#### **QUESTIONS**

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	165579
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	2	
Testimony time (in minutes)	Not answered.	