MAR 28 2019 FM02:55

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

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

CASE NO. 20367

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

CASE NO. 20368

MATADOR'S PRE-HEARING STATEMENT

Matador Production Company, the applicant in the above-referenced matters, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

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

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
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
ibroggi@hollandhart.com

APPLICANT'S STATEMENT OF CASE

In Case No. 20367, Matador Production Company seeks an order pooling all uncommitted interests in the Bone Spring formation in the 385.22-acre, more or less, horizontal spacing unit

comprised of the E/2 E/2 of Sections 21, 28, and 33 of Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico. The spacing unit will be dedicated to the proposed **Voni Fed Com 104H Well**, which will be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 21 to bottom hole location in the SE/4 NE/4 of irregular Section 33, and the proposed **Voni Fed Com 124H Well**, which will be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 21 to bottom hole location in the in SE/4 NE/4 of irregular Section 33. The completed interval for these wells will remain within the standard offset required by the statewide rules set forth in 19.15.15 NMAC.

In Case No. 20368, Matador Production Company seeks an order pooling all uncommitted interests in the Wolfcamp formation in the 770.44-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 21, 28, and 33 of Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico. The spacing unit will be dedicated to the following proposed wells:

- Voni Fed Com 224H Well, which will be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 21 to bottom hole location in the SE/4 NE/4 of irregular Section 33.
- Voni Fed Com 204H Well, which will be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 21 to bottom hole location in the SE/4 NE/4 of irregular Section 33.
- Voni Fed Com 203H Well, which will be horizontally drilled from a surface location in the in NW/4 NE/4 (Unit B) of Section 21 to bottom hole location in the SW/4 NE/4 of irregular Section 33.

 Voni Fed Com 223H Well, which will be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 21 to bottom hole location in the SW/4 NE/4 of irregular Section 33.

The completed interval for each well will remain within the setbacks required by the Special Rules for the Purple Sage; Wolfcamp (Gas) (Pool Code 98220).

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Cassie Hahn, Landman	Approx. 15 minutes	Approx.7
Clark Collier, Geologist	Approx. 10 minutes	Approx. 4

PROCEDURAL MATTERS

Matador respectfully requests that Case Nos. 20367 and 20368 be consolidated for hearing purposes. Matador intends to present these cases with live witness.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

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