

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

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

Case Nos. 20734-20736

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Matador Production Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

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

Attention: Kyle Perkins
(972) 371-5202

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENTS

Marathon Oil Permian LLC

Sharon Shaheen

OPPONENTS' ATTORNEY

Earl DeBrine
Lance Hough

Tap Rock Resources, LLC

STATEMENT OF THE CASE

APPLICANT

Case No. 20734: Applicant seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2E/2 of Section 36 and W/2E/2 of Section 25, Township 23 South, Range 28 East, NMPM. The unit will be dedicated to

the Ray State Com. 36 & 25-23S-28E Well No. 123H, with a first take point in the SW/4SE/4 of Section 36 and a final take point in the NW/4NE/4 of Section 25.

Case No. 20735: Applicant seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the E/2E/2 of Section 36 and E/2E/2 of Section 25, Township 23 South, Range 28 East, NMPM. The unit will be dedicated to the Ray State Com. 36 & 25-23S-28E Well No. 124H, with a first take point in the SE/4SE/4 of Section 36 and a final take point in the NE/4NE/4 of Section 25.

Case No. 20735: Applicant seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the E/2 of Section 36 and E/2 of Section 25, Township 23 South, Range 28 East, NMPM. The unit will be dedicated to

(a) the Ray State Com. Well No. 203H, with a first take point in the SW/4SE/4 of Section 36 and a final take point in the NW/4NE/4 of Section 25;

(b) the Ray State Com. Well No. 204H, with a first take point in the SE/4SE/4 of Section 36 and a final take point in the NE/4NE/4 of Section 25;

(c) the Ray State Com. Well No. 217H, with a first take point in the SE/4SE/4 of Section 36 and a final take point in the NE/4NE/4 of Section 25;

(d) the Ray State Com. Well No. 223H, with a first take point in the SW/4SE/4 of Section 36 and a final take point in the NW/4NE/4 of Section 25; and

(e) the Ray State Com. Well No. 224H, with a first take point in the SE/4SE/4 of Section 36 and a final take point in the NE/4NE/4 of Section 25.

Also to be considered in each case will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

OPPONENTS

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Sarah Hartsfield (landman)	25 min.	Approx. 12
Dan Brugioni (landman)	20 min.	Approx. 10

OPPONENTS

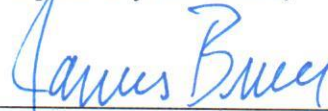
WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Matador Production Company

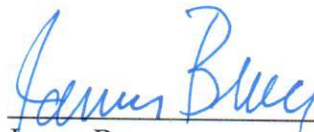
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 12th day of September, 2019 by e-mail:

Earl DeBrine
edebrine@modrall.com

Lance Hough
ldh@modrall.com

Sharon Shaheen
sshaheen@montand.com



James Bruce