

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

2015 AUG 13 P 4: 23

APPLICATION OF MATADOR
PRODUCTON COMPANY
TO RE-OPEN CASE NO. 15245 FOR
COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.

CASE NO. 15245 (re-opened)

MATADOR'S PRE-HEARING STATEMENT

Matador Production Company ("Matador"), submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Matador Production Company
One Lincoln Centre
5400 LBJ Freeway,
STE 1500
Dallas, TX 75240

ATTORNEY

Earl E. DeBrine, Jr., Esq.
Jennifer L. Bradfute, Esq.
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

OPPONENT

No other party has entered an appearance in this case.

STATEMENT OF CASE

APPLICANT:

Applicant in the above-styled cause seeks an order to pool all uncommitted mineral interests in the Wolfcamp formation underlying the S/2 of Section 12, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico, pursuant to the provisions of NMSA (1978), § 70-2-17.

In Order No. R-13970, the Division previously approved a standard 320-acre, more or less, gas spacing and proration unit in the Wolfcamp formation, comprised of the S/2 of Section 12, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico, and an unorthodox location within the project area for Matador's proposed well – the Tom Walters 12-23-27E RB Well No. 203H. Matador believed it would be able to reach an agreement with mineral interest owners in a portion of the lands located in the S/2 of Section 12 to participate in the drilling of the well, or to otherwise commit their interests to the well. As a result, Matador requested that its request to compulsory pool the uncommitted interests in the S/2 of Section 12 be dismissed, and Order No. R-13970 dismissed Matador's request for compulsory pooling. The uncommitted interest owners subsequently refused to commit their interests in the project area. Accordingly, Matador seeks an order from the Division pooling all mineral interests in the Wolfcamp formation underlying the project area located in the S/2 of Section 12, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico.

Also to be considered will be the cost of drilling and completing said well, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Matador as operator of the well, and a 200% charge for risk involved in drilling said well. Said area is located approximately 3 miles northwest of Loving, New Mexico.

OPPONENT: None anticipated.

PROPOSED EVIDENCE

APPLICANT:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Rudy Sims – Landman	Approx. 15	Approx. 6
Jonathan Filbert – Landman	Approx. 10	
Jeron Williamson – Engineer	Approx. 10	Approx. 4

Respectfully submitted,

**MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.**

By:  _____

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**ATTORNEYS FOR MATADOR PRODUCTION
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