

**JAMES BRUCE**  
ATTORNEY AT LAW

POST OFFICE BOX 1056  
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213  
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)  
(505) 660-6612 (Cell)  
(505) 982-2151 (Fax)

[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

RECEIVED OGD

2016 MAR 21 A 10: 59

*Case 15484*

March 15, 2016

Florene Davidson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Dear Florene:

Enclosed for filing, on behalf of Matador Production Company, is an application for compulsory pooling, together with a proposed advertisement. Please set this matter for the April 14, 2016 Examiner hearing. Thank you.

Very truly yours,



James Bruce

Attorney for Matador Production Company

Parties Being Pooled

RECEIVED OGD

2016 MAR 21 A 10:59

Jack Francis Habig, Jr.	9414 E 85th St, Raytown MO 64138-3321
Carol L. Habig	8718 Wornall Rd Apt 3 Kansas City, MO 64114
Marcia A. Nash	2613 Clark AVE Billings, MT 59102 (406) 656-0687
Frederick J. Stuessi	5625 Hall Street Shawnee, KS 66217 913-962-6196
Ellen Stuessi Larken	Geisenbergstr.18 66892 Bruchmühlbach, Germany 011-49-6372-50699
Nicole (Arlene) Stuessi Yates	11524 SE 221st Place Kent, WA 98031 253-813-9592
Roger Davis Stuessi	Lake Forest Park, WA 98155 206-368-0509 206-368-0437
Kevin Adams Stuessi	221 West 78th Apt. G New York, NY 10024
Kelli Arleen Stuessi Clifford	8119 Chestnut Glen Ave. Las Vegas, NV 89131 kclifford@cox.net
Wesley Everett Steessi	3300 Kauai Court Apt. F5 Reno, NV 89509-4811
Riley George Steesy	210 Iris Way Ventura, CA 93004-1421 (408) 532-9020
Melanie Mae Steesy Stewart	21 Glen Burnie Road Palmyra, VA 22963-3239
Katherine Forest Stacey Baxter	310 Alma Real Drive Pacific Palisades, CA 90272 (959) 592-6523 (possible)
Ronald Steysdorf	1440 25th Street SE, Auburn, WA 98002-7830 (253) 833-9036
John Lewis Marie, Jr.	411 S. Random Road Nalley, CO 80421

Greg W. Stuessi	121 Chesterfield Place SW Leesburg, VA 20175
Valerie J. Hoffman	5330 W Ridge Road Kansas City, KS 64108
David Stuessi Gillespie	9483 Garden Knoll Way Lakeside, CA 92040 (858) 519-4526
Daniel W. Gillespie	same as David
James K. Gillespie	Same as David 323-661-1097
Carol Stuessi Dyson	2758 S. 1020 W. Nibley, UT 84321
Nancy J. Stuessi Miles	10791 Sienna Dune Dr. South Jordan, UT 84095 (801) 544-0588
Daniel Craig	1390 Broadway #B-101 Placerville, CA 95667
Karl Richard Stacey	318 Bordeaux Drive La Porte, IN 46350
Paula Stacey Leblanc	3056 Eastwood Terrace The Villages FL 32163
Mai Jan Stacey	3056 Eastwood Terrace The Villages FL 32163
Jamie Cohen-Stacey	3056 Eastwood Terrace The Villages FL 32163

Jeanette Stacey	3056 Eastwood Terrace The Villages FL 32163
Karl F. Myers, Individually and as Guardian for Frank Myers	6245 N. London Ave Apartment E Kansas City, MO 64151-4799
Beth Cagle Webster	P O Box 282 Lake Orion, MI 48361
Joshua R. Bowen	1210 Ridge Circle Apt A Tonganoxie, Kansas 66086 913-579-6195
Robert J. Bowen	19137 Cantrell Road Linwood, KS 66052 (913) 301-3673
Kimberly A Woehrman	16016 Prairie Way Basehor, KS 66007-9737
Joanne Johnson	2700 Somerset Dr. #217 Prairie Village, KS 66206-1173
Steve Hodge	P.O. Box 3111 Rancho De Tao, NM 87557
John M. Pickard	8707 E Florida Ave. #914 Denver, CO 80231
Laurel J. Pickard	8305 W. Dana St. Milwaukee, WI 53214 (719) 265-9325 (414) 687-5618
Robert D. Pickard	417 Apple Ave Albertville, AL 35950 (256) 878-5285
Delbert Joseph Fitzgerald, dcd Delbert Joseph Fitzgerald, Jr.	Apartment 1405 Tulsa, OK 74146 918-402-2616  2411 E. 7th Street
Delbert Joseph Fitzgerald, dcd Richard Fitzgerald	4806 E. 37th Place Tulsa, Oklahoma 74135 918-271-7171

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

RECEIVED OOD

2016 MAR 21 A 10: 59

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

Case No.

15484

APPLICATION

Matador Production Company applies for an order pooling all mineral interests in the Wolfcamp formation underlying the S½ of Section 5, Township 24 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, and in support thereof, states:

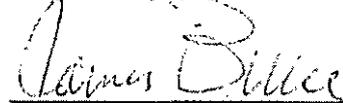
1. Applicant is an operator in the S½ of Section 5, and has the right to drill a well thereon.
2. Applicant has drilled its Jimmy Kone 5-24S-28E RB Well No. 208H to a depth sufficient to test the Wolfcamp formation (South Culebra Bluff-Wolfcamp Gas Pool). Applicant seeks to dedicate the well to the S½ of Section 5 to form a standard 320 acre spacing and proration unit in the Wolfcamp formation for all pools or formations developed on 320 acre spacing within that vertical extent. The well is a horizontal well, with a surface location in the SW¼SW¼ of adjoining Section 4, and a terminus in the SW¼SW¼ of Section 5.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the S½ of Section 5 for the purposes set forth herein.
4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all mineral interest owners in the S½ of Section 5, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral interests in the Wolfcamp formation underlying the S½ of Section 5 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

**WHEREFORE**, applicant requests that, after notice and hearing, the Division enter its order:

- A. Pooling all mineral interests in the Wolfcamp formation underlying the S½ of Section 5;
- B. Designating applicant as operator of the well;
- C. Considering the cost of drilling and completing the well, and allocating its cost among the well's working interest owners;
- D. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- E. Setting a 200% charge for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,



---

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

Attorney for Matador Production Company

PROPOSED ADVERTISEMENT

Case No. \_\_\_\_\_:

*Application of Matador Production Company for compulsory pooling, Eddy County, New Mexico.* Applicant seeks an order pooling all mineral interests in the Wolfcamp formation underlying the the S/2 of Section 5, Township 24 South, Range 28 East, NMPM, for all pools or formations developed on 320 acre spacing within that vertical extent, including the South Culebra Bluff-Wolfcamp Gas Pool. The unit will be dedicated to the Jimmy Kone 5-24S-28E RB Well No. 208H, a horizontal well with a surface location in the SW/4SW/4 of adjoining Section 4, and a terminus in the SW/4SW/4 of Section 5. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The unit is located approximately 2-1/2 mile northwest of Malaga, New Mexico.

RECEIVED OGD  
2016 MAR 21 A 10:59