

2016 APR 21 P 2:48

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

**APPLICATION OF MATADOR PRODUCTION COMPANY  
FOR A NON-STANDARD LOCATION, EDDY COUNTY,  
NEW MEXICO.**

**CASE NO. 15486**

**PRE-HEARING STATEMENT**

RSC RESOURCES, L.P., and GUARDIAN OPERATING CORPORATION, ("RSC Resources"), provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

RSC RESOURCES, L.P.; GUARDIAN  
OPERATING CORPORATION

RSC RESOURCES, L.P.; GUARDIAN  
OPERATING CORPORATION'S  
ATTORNEY

J. Scott Hall, Esq.  
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**APPLICANT**

MATADOR PRODUCTION COMPANY

**APPLICANT'S ATTORNEY**

Jennifer L. Bradfute  
Modrall Sperling  
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**STATEMENT OF THE CASE**

Applicant Matador Production Company seeks an order from the Division approving an unorthodox well location for its Janie Conner 13-24S-28E RB #201H well located in the N/2 of Section 13, Township 24 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

RSC Resources, L.P. and its affiliate company, Guardian Operating Corporation own and operate lease acreage immediately offsetting Matador's proposed well and their correlative rights will be adversely affected by the proposed unorthodox location of the well.

### PROPOSED EVIDENCE

<u>OPPONENT:</u> RSC RESOURCES, L.P.; GUARDIAN OPERATING CORPORATION	<u>EST. TIME</u>	<u>EXHIBITS</u>
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WITNESSES:

Randall Cate, President, Petroleum Engineer	30 min.	2
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<u>APPLICANT:</u> MATADOR PRODUCTION COMPANY	<u>EST. TIME</u>	<u>EXHIBITS</u>
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WITNESSES:

### PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

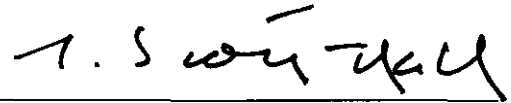
By: J. Scott Hall  
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*Attorneys for RSC Resources, L.P.; Guardian  
Operating Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on April 21, 2016:

Jennifer L. Bradfute  
Modrall Sperling  
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A handwritten signature in black ink, appearing to read "J. Scott Hall", written over a horizontal line.

J. Scott Hall