

**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. 20365

APPLICATION

Matador Production Company, ("Matador"), through its undersigned attorneys, hereby files this application with the Oil Conservation Division pursuant to the provisions of N.M. Stat. Ann. § 70-2-17, for an order pooling all uncommitted interests in the Bone Spring formation in the 320-acre horizontal spacing unit comprised of the W/2 W/2 of Sections 15 and 22, Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico. In support of its application, Matador states:

1. An affiliate entity of Matador Production Company (OGRID No. 228937) is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon.

2. Matador seeks to dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- **Boros Fed Com 101H Well**, which will be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 15 to bottom hole location in the SW/4 SW/4 (Unit M) of Section 22.
- **Boros Fed Com 121H Well**, which will be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 15 to bottom hole location in the in SW/4 SW/4 (Unit M) of Section 22.

3. The completed interval for each well will remain within the standard setback as required by the Statewide rules for oil wells. Because Matador anticipates that the proposed wells will be simultaneously drilled and completed, Matador requests an extension of the time period to drill and complete the initial well from 120 days to 365 days.

4. Matador has sought and been unable to obtain voluntary agreement for the development of these lands from all the working interest owners in the subject spacing unit.

5. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

6. In order to permit Matador to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this horizontal spacing unit should be pooled and Matador Production Company should be designated the operator of this proposed horizontal well and spacing unit.

WHEREFORE, Matador requests that this application be set for hearing before an Examiner of the Oil Conservation Division on April 4, 2019, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the horizontal spacing unit;
- B. Designating Matador Production Company operator of this spacing unit and the horizontal well to be drilled thereon;
- C. Authorizing Matador to recover its costs of drilling, equipping and completing the well;
- D. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and

- E. Imposing a 200% penalty for the risk assumed by Matador in drilling and completing the well against any working interest owner who does not voluntarily participate in the drilling of the well.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com

**ATTORNEYS FOR MATADOR PRODUCTION
COMPANY**

CASE _____: **Application of Matador Production Company for compulsory pooling, Eddy County, New Mexico.** Applicant in the above-styled cause seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a 320-acre horizontal spacing unit comprised of the W/2 W/2 of Sections 15 and 22, Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico. The above-referenced unit will be dedicated to the following proposed wells:

- **Boros Fed Com 101H Well**, which will be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 15 to bottom hole location in the SW/4 SW/4 (Unit M) of Section 22.
- **Boros Fed Com 121H Well**, which will be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 15 to bottom hole location in the in SW/4 SW/4 (Unit M) of Section 22.

The completed interval for each well will remain within the standard setbacks as required by the Statewide rules for oil wells. Also, to be considered will be the cost of drilling and completing the well, the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of Matador Production Company as operator, and a 200% charge for risk involved in drilling and completing the well. Said area is located approximately 36 miles southeast of Carlsbad, New Mexico.