

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

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

CASE NOS. 16470 - 16473

MATADOR'S AMENDED CONSOLIDATED PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

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

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Kaitlyn A. Luck, Esq.
Holland & Hart, LLP
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
kaluck@hollandhart.com

OTHER INTERESTED PARTIES

Jalapeno Corp.

J.E. Gallegos, Esq
Michael J. Condon, Esq
460 St Michael's Drive, Bldg 300
Santa Fe NM 87505
(505) 983-6686
jeg@gallegoslawfirm.net
mjc@gallegoslawfirm.net

Mewbourne Oil Company

Jim Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, Matador seeks orders pooling all uncommitted interests in the following standard horizontal spacing units in the Bone Spring formation underlying Sections 29 and 30, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico:

In **Case No. 16470**, a 316.36-acre horizontal spacing unit in the Bone Spring formation comprised of the N/2 N/2 of Sections 29 and 30 to be dedicated to the proposed **Leatherneck 30 Fed No. 121H Well** which has been renamed the **Leatherneck 30 Fed No. 125H Well**. The original surface location for this well was to be in the NW/4 NW/4 (Lot 1) of Section 30 but has been moved to the SW/4 NW/4 (Lot 2) of Section 30. It will be horizontally drilled to a bottom-hole location in the NE/4 NE/4 (Unit A) of Section 29.

In **Case No. 16471**, a 316.84-acre horizontal spacing unit in the Bone Spring formation comprised of the S/2 N/2 of Sections 29 and 30 to be dedicated to the proposed **Leatherneck 30 Fed No. 122H Well** which has been renamed the **Leatherneck 30 Fed No. 126H Well**. It be horizontally drilled from a surface location in the SW/4 NW/4 (Lot 2) of Section 30 to bottom hole location in the SE/4 NE/4 (Unit H) of Section 29.

In **Case No. 16472**, a 317.32-acre horizontal spacing unit in the Bone Spring formation comprised of the S/2 N/2 of Sections 29 and 30 to be dedicated to the proposed **Leatherneck 30 Fed No. 123H Well** which has been renamed the **Leatherneck 30 Fed No. 127H Well**. The original surface location for this well was to be in the NW/4 SW/4 (Lot 3) of Section 30 but has been moved to the SW/4 SW/4 (Lot 4) of Section 30. It will be horizontally drilled to a bottom-hole location in the NE/4 SE/4 (Unit I) of Section 29.

In **Case No. 16473**, a 317.82-acre horizontal spacing unit in the Bone Spring formation comprised of the S/2 S/2 of Sections 29 and 30 to be dedicated to the proposed **Leatherneck 30 Fed No. 124H Well** which has been renamed the **Leatherneck 30 Fed No. 128H Well**. It will be horizontally drilled from a surface location in the SW/4 SW/4 (Lot 4) of Section 30 to a bottom-hole location in the SE/4 SE/4 (Unit P) of Section 29.

The completed intervals for these wells will remain within the standard offset required by the statewide rules for horizontal oil wells.

APPLICANT'S PROPOSED EVIDENCE

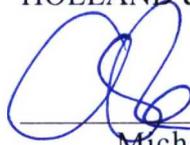
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Sam Pryor, Landman	Approx. 20	Approx. 5
Andrew Juett, Geologist	Approx. 15	Approx. 5

PROCEDURAL MATTERS

Matador does not expect any opposition to these applications and intends to consolidate these four cases for presentation by affidavit at the Examiner hearing. Matador further requests that orders granting these applications reflect the updated well names in each case and, as to Case Nos. 16470 and 16472, the updated surface locations.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
arankin@hollandhart.com
jbroggi@hollandhart.com

**ATTORNEYS FOR MATADOR PRODUCTION
COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2019, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

J.E. Gallegos
Michael J. Condon
460 St Michael's Drive Bldg 300
Santa Fe NM 87505
505-983-6686
jeg@gallegoslawnfirm.net
mjc@gallegoslawnfirm.net

Attorneys for Yates Energy Corporation

Jim Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com

Attorney for Mewbourne Oil Company



Adam G. Rankin