

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

**APPLICATION OF MATADOR PRODUCTION
COMPANY FOR A NON-STANDARD SPACING
AND PRORATION UNIT AND COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

Case No. 15363

SUBPOENA

**TO: Matador Production Company
c/o James G. Bruce
P.O. Box 1056
Santa Fe, NM 87504
jamesbruc@aol.com**

YOU ARE HEREBY COMMANDED pursuant to NMSA 1978 §70-2-8 and Rule 19.15.4.16.A NMAC to produce the following documents at the offices of the Gallegos Law Firm, P.C., 460 St. Michael's Drive, Bldg. 300, on or before August 28, 2015:

1. Matador's complete land files, and ownership files, related to the Airstrip State Com 201H which is the subject of the application in this case, including documents which reflect the ownership of all parties subject to this application, including Matador, within the proposed 154.28 acre non-standard spacing unit.
2. Matador's complete well file for the Airstrip State Com 201H well which is the subject of the application in this case.
3. All documents which support Matador's AFE for the Airstrip State Com 201H, including rig costs, drilling contracts, rig day rates, costs of the proposed fracture stimulation, salt water disposal costs, and other well costs.

4. All documents reflecting any bids Matador has solicited and responses Matador has received from third party contractors related to the proposed drilling and completion of the Airstrip State Com 201H well.

5. With respect to any operator owned or contracted drilling rigs, disposal wells, or other operator-owned facilities, the actual operating costs Matador incurs or expects to incur and the costs Matador charges or intends to charge non-operators for the Airstrip State Com 201H well.

6. Documents reflecting the proposed drilling plan for the Airstrip State Com 201H, including but not limited to documents that reflect how far below the top of the Wolfcamp formation the proposed lateral will be drilled; whether the well will test or penetrate the Bone Spring formation as well as the Wolfcamp formation; and whether Matador proposes to frac the well so as to penetrate both the Bone Spring and Wolfcamp formations.

7. The complete well file for the Heyco (now Matador) Southeast Airstrip #1 well which was drilled in Unit N of Section 31, T-18-S, R-35-E, API # 3002527618, including but not limited to documents that reflect results of the drill-stem test of the Wolfcamp formation, logs, and engineering analysis for the well.

8. All documents which reflect the actual drilling and completion costs of the Tiger 14 24s 28e RB No. 204H well drilled in June 2015 (API No. 30-015-43087), and any well Matador has drilled to the Bone Spring or Wolfcamp formation in T-18-S, R-34-E, T-18-S, R-35-E, T-19-S, R-34-E, and T-19-S, R-35-E, Lea County, New Mexico.

9. All documents which reflect engineering analysis of the reserves and ultimate expected recovery for oil wells Matador has drilled or plans to drill in T-18-S, R-34-E, T-18-S, R-35-E, T-19-S, R-34-E, and T-19-S, R-35-E, Lea County, New Mexico.

10. All documents which reflect any analysis Matador has undertaken to assess its risk in drilling the Airstrip State Com 201H well, including documents which Matador contends support its requested 200% risk penalty.

11. All documents which reflect Matador's economics and financial analysis related to the Airstrip State Com 201H well, including the actual price Matador anticipates receiving for well production, whether any of that production is hedged, if hedged, the hedge price, including any hedge agreements that relate to production from the well.

12. A current resume or curriculum vitae for the "technical experts" referenced in Mr. Bruce's letter of August 11, 2015, whom Matador intends to call as witnesses at the hearing in this matter.

13. Any exhibits Matador intends to introduce at the hearing in Case No. 15363.



David Catanach, Director
Oil Conservation Division