

**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. 20937

MATADOR'S PRE-HEARING STATEMENT

Matador Production Company ("Matador") (OGRID No. 228937), the applicant in the above-referenced case, 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
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
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

APPLICANT'S STATEMENT OF CASE

Matador seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) (Pool Code 98220)) underlying a standard 480-acre, more or less, horizontal spacing unit comprised of the NW/4 of Section 29 and the W/2 of Section 20, Township 22 South, Range 27 East, NMPM, Eddy County, New Mexico; and (2) dedicating the spacing unit to the proposed **Dr. Steve Ohnimus Com #202H well** (API No. pending) to be horizontally

drilled from a surface location in the NE/4 SW/4 (Unit K) of Section 29, to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 20. Pursuant to the Special Rules for the Purple Sage; Wolfcamp (Gas) (Pool Code 98220), the completed interval for this well will comply with the 330-foot setback requirement.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Robert Helbing, Landman	Affidavit	Approx. 4
Dan Brugioni, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

If unopposed at the time of hearing, Matador intends to present this case by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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

ATTORNEYS FOR MATADOR PRODUCTION COMPANY