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September 15, 2015

Florene Davidson
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Florene:

Enclosed for filing, on behalf of Matador Production Company, is an application for compulsory pooling, *etc.*, together with a proposed advertisement. Please set this matter for the October 15, 2015 Examiner hearing. Thank you.

Very truly yours,

James Bruce

Attorney for Matador Production Company

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2015 SEP 15 A 10: 11

Case 15395

Parties Being Pooled

Vickey Moser 178 Night Sky Spring Branch, Texas 78070

James M. Stockton 2617 Coronado Drive Roswell, New Mexico 88201

Global Nevada, Galaxy Inc. 1001 Fannin St., Suite 1700 Houston, TX 77002-6707

Patsy Hollandsworth P.O. Box 1632 Longview, TX 75606

XTO Energy, Inc. Atm: Keith Sawyer 810 Houston Street Fort Worth, TX 76102

The Allar Company
P.O. Box 1567
Graham, TX 76450-7567

Grace Pearl Hollandsworth P.O. Box 3427 Longview, TX 75606

Keith McKamey 1400 Hall Drive Roswell, NM 88201

Peggy Runyan P.O. Box 869 Kapaa, Hawaii 96746

Chevron U.S.A. P.O. Box 2100 Houston, TX 77252

BEFORE THE NEW MEXICO OIL CONSERVATION TO THE NEW M

APPLICATION OF MATADOR PRODUCTION COMPANY FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT, COMPULSORY POOLING, AND AN UNORTHODOX OIL WELL LOCATION, LEA COUNTY, NEW MEXICO.

2015 SEP 15 A 10: 11

Case No. 15395

APPLICATION

Matador Production Company applies for an order (i) approving a 240 acre non-standard oil spacing and proration unit in the Bone Spring formation comprised of the E½SE¼ of Section 22 and the E½E½ of Section 27. Township 19 South, Range 34 East, N.M.P.M., Lea County, New Mexico, (ii) pooling all mineral interests in the Bone Spring formation underlying the non-standard unit, and (iii) approving an unorthodox oil well location, and in support thereof, states:

- 1. Applicant is an operator, in the E½SE¼ of Section 22 and the E½E½ of Section 27, and has the right to drill a well thereon.
- 2. Applicant proposes to drill the Mallon 27 Fed. Com. Well No. 1H to a depth sufficient to test the Bone Spring formation. Applicant seeks to dedicate the E½SE½ of Section 22 and the E½E½ of Section 27 to the well to form a non-standard 240 acre oil spacing and proration unit (project area) in the Bone Spring formation for any pools developed on 40 or 80 acre spacing within that vertical extent. The well is a horizontal well with a surface location 330 feet from the south line and 660 feet from the east line of Section 27, and a terminus 2310 feet from the south line and 660 feet from the east line of Section 22. The location is unorthodox under the regulations for the Lea-Bone Spring Pool.

- 3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the E½SE¼ of Section 22 and the E½E½ of Section 27 for the purposes set forth herein.
- 4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the wells or to otherwise commit their interests to the wells, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all mineral interest owners in the E½SE¼ of Section 22 and the E½E½ of Section 27, pursuant to NMSA 1978 §§70-2-17, 18.
- 5. Approval of the non-standard unit, the pooling of all mineral interests underlying the E½SE½ of Section 22 and the E½E½ of Section 27, and approval of the unorthodox well location, will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, applicant requests that, after notice and hearing, the Division enter its order:

- A. Approving a non-standard oil spacing and proration unit (project area) in the Bone Spring formation in the E½SE¼ of Section 22 and the E½E½ of Section 27;
- B. Pooling all mineral interests in the Bone Spring formation underlying the E½SE½ of Section 22 and the E½E½ of Section 27;
- C. Approving the unorthodox oil well location;
- D. Designating applicant as operator of the well;
- E. Considering the cost of drilling and completing the well, and allocating the costs among the well's working interest owners;

- F. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- G. Setting a 200% charge for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Matador Production Company

PROPOSED ADVERTISEMENT

Case No. 15395:

Application of Matador Production Company for approval of a non-standard oil spacing and proration unit, compulsory pooling, and an unorthodox oil well location, Lea County, New Mexico. Applicant seeks an order approving a 240-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the E/2SE/4 of Section 22 and E/2E/2 of Section 27, Township 19 South, Range 34 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard spacing and proration unit (project area) for all pools developed on 40 or 80 acre spacing within that vertical extent. The unit is to be dedicated to the Mallon 27 Fed. Com. Well No. 1H, a horizontal well with a surface location 330 feet from the south line and 660 feet from the east line of Section 27, and a terminus 2310 feet from the south line and 660 feet from the east line of Section 22. The location is unorthodox under regulations for the Lea-Bone Spring Pool. Also to be considered will be the cost of drilling and completing the well and the allocation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The unit is located approximately 11-1/2 miles west-southwest of Oil Center, New Mexico.

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