

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

RECEIVED  
2016 MAR 24 A 11: 31

**APPLICATION OF MATADOR PRODUCTION COMPANY  
FOR A NON-STANDARD LOCATION, EDDY COUNTY,  
NEW MEXICO [Tiger 14-24S-28E RB #223H].**

**CASE NO. 15458**

**PRE-HEARING STATEMENT**

RSC RESOURCES, L.P., and GUARDIAN OPERATING CORPORATION, ("RSC Resources"), provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

RSC RESOURCES, L.P.; GUARDIAN  
OPERATING CORPORATION

RSC RESOURCES, L.P.; GUARDIAN  
OPERATING CORPORATION'S  
ATTORNEY

J. Scott Hall, Esq.  
Seth C. McMillan  
MONTGOMERY & ANDREWS, P.A.  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
Tele (505) 982-3873  
[shall@montand.com](mailto:shall@montand.com)  
[smcmillan@montand.com](mailto:smcmillan@montand.com)

APPLICANT

MATADOR PRODUCTION COMPANY

APPLICANT'S ATTORNEY

Jennifer L. Bradfute  
Modrall Sperling  
P.O. Box 2168  
Albuquerque, NM 87103-2168  
[jlb@modrall.com](mailto:jlb@modrall.com)

**STATEMENT OF THE CASE**

Applicant Matador Production Company seeks an order approving an unorthodox well location for its [Tiger 14, 24S-28E RB #223H] to be drilled horizontally to the Wolfcamp formation for the production of gas from the Culebra Bluff, Wolfcamp South Gas pool. The

Applicant proposes to complete the well as close as 330' from the boundaries of the project area for the well. The Tiger 14, 24S-28E RB #223H is to be located in the S/2 of Section 14, Township 24 South, Range 28 East, NMPM in Eddy County.

RSC Resources, L.P. and its affiliate company, Guardian Operating Corporation own and operate lease acreage immediately offsetting Matador's proposed well and their correlative rights will be adversely affected by the proposed unorthodox location of the well.

### **PROPOSED EVIDENCE**

OPPONENT: RSC RESOURCES, L.P.; GUARDIAN  
OPERATING CORPORATION

EST. TIME  
30 min

EXHIBITS  
2

WITNESSES:

Randall Cate, President, Petroleum Engineer

APPLICANT: MATADOR PRODUCTION COMPANY

EST. TIME

EXHIBITS

WITNESSES:

### **PROCEDURAL MATTERS**

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: J. Scott Hall

J. Scott Hall

Seth C. McMillan

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

shall@montand.com

smcmillan@montand.com

*Attorneys for RSC Resources L.P. and Guardian  
Operating Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on March 24, 2016:

Jennifer L. Bradfute  
Modrall Sperling  
P.O. Box 2168  
Albuquerque, NM 87103-2168  
jlb@modrall.com

A handwritten signature in black ink, appearing to read "J. Scott Hall", written over a horizontal line.

J. Scott Hall