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

APPLICATION OF MATADOR PRODUCTION COMPANY FOR A NON-STANDARD LOCATION, EDDY COUNTY, NEW MEXICO [Janie Conner 13-24S-28E RB #207H].

CASE NO. 15460

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	<u>RSC RESOURCES, L.P.; GUARDIAN</u> <u>OPERATING CORPORATION'S</u> <u>ATTORNEY</u>	
	J. Scott Hall, Esq. Seth C. McMillan MONTGOMERY & ANDREWS, P.A. P.O. Box 2307 Santa Fe, NM 87504-2307 Tele (505) 982-3873 <u>shall@montand.com</u> <u>smcmillan@montand.com</u>	
APPLICANT	APPLICANT'S ATTORNEY	
MATADOR PRODUCTION COMPANY	Jennifer L. Bradfute Modrall Sperling P.O. Box 2168 Albuquerque, NM 87103-2168 jlb@modrall.com	
STATEMENT OF THE CASE		
Applicant Matador Production Company seeks an order approving an unorthodox well		

location for its [Janie Conner 13, 24S-28E RB #207H] 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 Janie Conner 13, 24S-28E RB #207H 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

<u>OPPONENT</u> : RSC RESOURCES, L.P.; GUARDIAN OPERATING CORPORATION	EST. TIME 30 min	EXHIBITS 2
<u>WITNESSES</u> : Randall Cate, President, Petroleum Engineer		
APPLICANT: MATADOR PRODUCTION COMPANY	<u>EST. TIME</u>	<u>EXHIBITS</u>
WITNESSES:		

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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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

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