

2016 MAR 24 A 11: 31

**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 #226H].**

**CASE NO. 15461**

**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

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APPLICANT

MATADOR PRODUCTION COMPANY

APPLICANT'S ATTORNEY

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**STATEMENT OF THE CASE**

Applicant Matador Production Company seeks an order approving an unorthodox well location for its [Janie Conner 13, 24S-28E RB #226H] 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 #226H is to be located in the N/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: 

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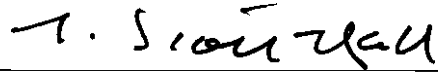
[smcmillan@montand.com](mailto:smcmillan@montand.com)

*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:

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