

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

RECEIVED OOD  
2016 AUG 11 P 12:54

IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:

APPLICATION OF MATADOR PRODUCTION  
COMPANY AND MEWBOURNE OIL COMPANY  
TO ESTABLISH THE DOWNEY GAS POOL IN THE  
WOLFCAMP FORMATION FOR TOWNSHIPS 22  
THROUGH 26 SOUTH AND RANGES 25 EAST  
THROUGH 31 EAST, NMPM, EDDY COUNTY,  
NEW MEXICO, AND TO ESTABLISH SPECIAL  
POOL RULES FOR SAID POOL.

Case No. 15,535

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicants as required by the Oil Conservation Division.

APPEARANCES

APPLICANTS

Matador Production Company  
Suite 1500  
5400 LBJ Freeway  
Dallas, Texas 75240

Attention: Chris Carleton

Mewbourne Oil Company  
Suite 1020 500 West Texas  
Midland, Texas 79701

Attention: Drew Robison

APPLICANTS' ATTORNEY

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

OPPONENT

OPPONENT'S ATTORNEY

## STATEMENT OF THE CASE

### APPLICANT

Applicants seek an order creating a new pool, designated the Downey-Wolfcamp Gas Pool, covering the Wolfcamp formation in Townships 22 through 26 South, and Ranges 25 East Through 31 East, NMPM, Eddy County, and instituting special rules and regulations for the pool including 320 acre spacing and special well locations requirements. All existing Wolfcamp pools, and wells within the existing pools, shall be re-classified as being within the Downey-Wolfcamp Gas Pool.

### OPPONENT

## PROPOSED EVIDENCE

### APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
<b><u>Primary Witnesses</u></b>		
Chris Carleton (landman - Matador)	20 min.	Approx. 6
Clark Collier (geologist - Matador)	20 min.	Approx. 6
Drew Robison (reservoir engineer - Mewbourne)	30 Min.	Approx. 6
<b><u>Alternate Witnesses</u></b>		
Jonathan Filbert (landman - Matador)	20 min.	Approx. 6
Ned Frost (geologist - Matador)	20 min.	Approx. 6
Nate Cless (geologist – Mewbourne)	20 min.	Approx. 6
Tom Elsener (engineer - Matador)	30 Min.	Approx. 6

Alternate witnesses would be used if a primary witness is unavailable for the hearing.

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "James Bruce", written over a horizontal line.

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Applicants