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December 12, 2017

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Case 15929

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 a nonstandard unit and compulsory pooling, together with a proposed advertisement. Please set this matter for the January 11, 2018 Examiner hearing. Thank you.

Very trily yours,

James Bruce

Attorney for Matador Production Company

Parties Being Pooled

Marbob 19 State Com #124H
Name
Bernhardt Oil Corporation
Betty Read Young
Buchholz Oil & Gas Co.
Nina Anderson - possible claimant to the Estate of C. Lee Anderson
Carolyn R. Beall
Charlene M. Ward
COG Operating LLC
Colgate Production, LLC
Concho Oil & Gas LLC
EHW, LLC
Catherine Roach Baker - possible claimant to the Estate of Gerald F. Roach,
Deceased
Blaine Roach - possible claimant to the Estate of Gerald F. Roach, Deceased
Lola Roach Kelly - possible claimant to the Estate of Gerald F. Roach, Deceased
George Phillips Huey, Jr. (Life Estate)
Herbert Spencer
Simms and Reese Oil Company
Jack C. Holland
James W. Kennedy - possible claimant to the Estate of Faith Kennedy
John A. Yates, Trustee of Trust Q u/w/o Peggy A. Yates, deceased
Judy Scisson Ferreri
Laura K. Read, LLC
Lincoln Oil & Gas, LLC
Michael W. Kennedy - possible claimant to the Estate of Faith Kennedy
Nancy Peacock Mackey
Reserve Management Inc.
Richard D. Kennedy - possible claimant to the Estate of Faith Kennedy
Robert E. Ferguson et ux, Rosemary Ferguson
Roxanna Lynne Mills
Sharron S. Trollinger, Trustee of the Sharron Stone Trollinger Trust
Straight Profit, Inc.
American Shale Energy, LLC
Sue Howard
Teresa Burnsides
Texas A&M Foundation (Remainderman)
Turner Royalties, LLC

V.C. Desmond Trust, 1st National Bank, Trustee

Velda Gass

Virginia A. Desmond c/o First American Bank

Wanda Porter

Ward Investments, Ltd. Co.

William Kent Kennedy - possible claimant to the Estate of Faith Kennedy

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION RECEIVED OCD

APPLICATION OF MATADOR PRODUCTION COMPANY FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO. Case No. <u>15929</u>

APPLICATION

Matador Production Company applies for an order (i) approving a 152.49 acre nonstandard oil spacing and proration unit in the Bone Spring formation comprised of Lot 4, S½SE¼, and SE¼SW¼ (the S½S½) of Section 19, Township 19 South, Range 29 East, N.M.P.M., Eddy County, New Mexico, and (ii) pooling all mineral interests in the Bone Spring formation underlying the non-standard unit, and in support thereof, states:

1. Applicant is an operator in the S½S½ of Section 19, and has the right to drill a well thereon.

2. Applicant proposes to drill the Marbob 19 State Well No. 124H to a depth sufficient to test the Bone Spring formation. Applicant seeks to dedicate the S½S½ of Section 19 to the well to form a non-standard 152.49 acre oil spacing and proration unit (project area). The well is a horizontal well with a surface location in Lot 4, and a terminus in the SE½SE¼, of Section 19. The producing interval will be orthodox.

3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the S½S½ of Section 19 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 well or to otherwise commit their interests to the well, 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 Bone Spring formation underlying the S½S½ of Section 19, pursuant to NMSA 1978 §§70-2-17, 18.

5. Approval of the non-standard unit, and the pooling of all mineral interests in the Bone Spring formation underlying the S¹/₂S¹/₂ of Section 19, 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 comprised of the S½S½ of Section 19;

B. Pooling all mineral interests in the Bone Spring formation underlying the S½S½ of Section 19;

C. Designating applicant as operator of the well;

D. Considering the cost of drilling and completing the well, and allocating the costs among the well's working interest owners;

E. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and

F. 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,

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

Attorney for Matador Production Company

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PROPOSED ADVERTISEMENT

Case No. <u>15929</u>:

Application of Matador Production Company for approval of a non-standard spacing and proration unit and compulsory pooling, Eddy County, New Mexico. Applicant seeks an order approving a 152.49-acre non-standard spacing and proration unit (project area) in the Bone Spring formation comprised of Lot 4, S/2SE/4, and SE/4SW/4 (the S/2S/2) of Section 19, Township 19 South, Range 29 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). The unit will be dedicated to the Marbob 19 State Well No. 124H, a horizontal well with a surface location in Lot 4, and a terminus in the SE/4SE/4, of Section 19. The producing interval will be orthodox. 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 14-1/2 miles south-southwest of Loco Hills, New Mexico.

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