

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

**APPLICATION OF MATADOR PRODUCTION COMPANY
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 16435

**APPLICATION OF MATADOR PRODUCTION COMPANY
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 16407

MATADOR'S AMENDED PRE-HEARING STATEMENT

Matador Production Company, the applicant in the above-referenced matters, submits this
Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

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

ATTORNEY

Michael H. Feldewert, Esq.
Jordan L. Kessler, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
Email: mfeldewert@hollandhart.com
Email: jlkessler@hollandhart.com
Email: agrarkin@hollandhart.com
Email: jbroggi@hollandhart.com

APPLICANT'S STATEMENT OF CASE

In Case No. 16435, Matador Production Company seeks an order (1) creating, if necessary, a 160-acre, more or less, spacing and proration unit comprised of the E/2 W/2 of Section 35, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the Wolfcamp formation. The spacing unit will be dedicated to the proposed **Brad Dyer Federal No. 202H Well**, which will be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 35. The completed interval for this well will remain within the standard offset required by the statewide rules set forth in 19.15.15 NMAC.

In Case No. 16407, Matador Production Company seeks an (1) creating, if necessary, a 160-acre, more or less, spacing and proration unit comprised of the W/2 W/2 of Section 35, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the Wolfcamp formation. The spacing unit will be dedicated to the proposed **Brad Dyer Federal No. 205H Well**, which will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 35. The completed interval for this well will remain within the standard offset required by the statewide rules set forth in 19.15.15 NMAC.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Robert Helbing and Trey Goodwin, Landman	Approx. 15 minutes	Approx. 7
Andrew Parker, Geologist	Approx. 10 minutes	Approx. 4

PROCEDURAL MATTERS

Matador respectfully requests that Case Nos. 16435 and 16407 be consolidated for hearing purposes. Matador also will dismiss the requests for a non-standard spacing unit. If uncontested, Matador will present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

A handwritten signature in black ink, appearing to read 'M. Feldewert', is written over a horizontal line.

Michael H. Feldewert

Adam G. Rankin

Jordan L. Kessler

Julia Broggi

Post Office Box 2208

Santa Fe, NM 87504

505-998-4421

505-983-6043 Facsimile

mfeldewert@hollandhart.com

arankin@hollandhart.com

jlkessler@hollandhart.com

jbroggi@hollandhart.com

**ATTORNEYS FOR
MATADOR PRODUCTION COMPANY**