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

# APPLICATION OF MATADOR PRODUCTION COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

#### CASE NOS. 20623, 20624, 20625, 20626

### MATADOR'S CONSOLIDATED PRE-HEARING STATEMENT

Matador Production Company ("Matador"), 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 Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com

#### **APPLICANT'S STATEMENT OF CASE**

In Case No. 20623, Matador seeks an order pooling all uncommitted interests in the Wolfcamp formation (Burton Flat Upper Wolfcamp East (98315)) underlying a standard 320-acre horizontal spacing unit comprised of the N/2 N/2 of Sections 29 and 30, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. The spacing unit will be dedicated to the proposed **Leatherneck 3029 Fed Com #205H Well**, which will be horizontally drilled from a surface

location in the NW/4 NW/4 (Lot 1) of Section 30 to bottom hole location in the NE/4 NE/4 (Unit A) of Section 29. The completed interval for this well will comply with the standard setbacks required by the statewide rules set forth in 19.15.16.15 NMAC.

In Case No. 20624, Matador seeks an order pooling all uncommitted interests in the Wolfcamp formation (Burton Flat Upper Wolfcamp East (98315)) underlying a standard 320-acre horizontal spacing unit comprised of the S/2 N/2 of Sections 29 and 30, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. The spacing unit will be dedicated to the proposed **Leatherneck 3029 Fed Com #206H Well**, which will be horizontally drilled from a surface location in the SW/4 NW/4 (Lot 2) of Section 30 to bottom hole location in the SE/4 NE/4 (Unit H) of Section 29. The completed interval for this well will comply with the standard setbacks required by the statewide rules set forth in 19.15.16.15 NMAC.

In Case No. 20625, Matador seeks an order pooling all uncommitted interests in the Wolfcamp formation (Burton Flat Upper Wolfcamp East (98315)) underlying a standard 320-acre horizontal spacing unit comprised of the N/2 S/2 of Sections 29 and 30, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. This spacing unit will be dedicated to the proposed **Leatherneck 3029 Fed Com #207H Well**, which will be horizontally drilled from a surface location in the NW/4 SW/4 (Lot 3) of Section 30 to bottom hole location in the NE/4 SE/4 (Unit I) of Section 29. The completed interval for this well will comply with the standard setbacks required by the statewide rules set forth in 19.15.16.15 NMAC.

In Case No. 20626, Matador seeks an order pooling all uncommitted interests in the Wolfcamp formation (Burton Flat Upper Wolfcamp East (98315)) underlying a standard 320-acre horizontal spacing unit comprised of the S/2 S/2 of Sections 29 and 30, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. This spacing unit will be dedicated to the proposed

**Leatherneck 3029 Fed Com #208H Well**, which will be horizontally drilled from a surface location in the NW/4 SW/4 (Lot 3) of Section 30 to bottom hole location in the SE/4 SE/4 (Unit P) of Section 29. The completed interval for this well will comply with the standard setbacks required by the statewide rules set forth in 19.15.16.15 NMAC.

# **APPLICANT'S PROPOSED EVIDENCE**

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Sam Pryor, Landman	Approx. 15 minutes	Approx. 7
Andy Juett, Geologist	Approx. 10 minutes	Approx. 4

### PROCEDURAL MATTERS

Matador respectfully requests that Case Nos. 20623, 20624, 20625, and 20626 be

consolidated for hearing purposes. Matador intends to present these cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP Bv:

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ATTORNEYS FOR MATADOR PRODUCTION COMPANY