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

APPLICATIONS OF MRC PERMIAN COMPANY FOR APPROVAL OF AN OVERLAPPING HORIZONTAL WELL SPACING UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 23417-23418

MRC'S CONSOLIDATED PRE-HEARING STATEMENT

MRC Permian Company ("MRC" or "Applicant"), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

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MRC Permian Company ("MRC")

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APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, MRC seeks orders (a) approving the proposed standard overlapping spacing units and (b) pooling all uncommitted interests in the Bone Spring (Rock Lake; Bone Spring, South [52769] (Sections 4 and 9 acreage); and WC-025 G-06 S233516M;

Middle Bone Spring [98246] (Section 16 acreage)) underlying the referenced acreage all in Township 23 South, Range 35 East, NMPM, Lea County, New Mexico, as follows:

- Under Case No. 23417, MRC seeks to pool a standard 400-acre, more or less, overlapping horizontal well spacing unit comprised of the W/2 SE/4 of Section 4, and the W/2 E/2 of Sections 9 and 16 and initially dedicate this overlapping Bone Spring spacing unit to the proposed Marlan Downey State Com #123H well, to be horizontally drilled from a surface location in the N/2 SE/4 of Section 4 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 16. This 400-acre horizontal well spacing unit will overlap the following existing horizontal well spacing unit covering portions of the subject acreage: 240-acre, more or less, horizontal well spacing unit comprised of the W/2 SE/4 of Section 4 and the W/2 E/2 of Section 9, Township 23 South, Range 35 East, dedicated to the Marlan Downey State 04&09-23S-35E AR #113H well (API: 30-025-46254).
- Under Case No. 23418, Matador seeks to pool a standard 400-acre, more or less, overlapping horizontal well spacing unit comprised of the E/2 SE/4 of Section 4, and the E/2 E/2 of Sections 9 and 16 and initially dedicate this Bone Spring spacing unit to the proposed Marlan Downey State Com #124H well, to be horizontally drilled from a surface location in the N/2 SE/4 of Section 4 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 16. This 400-acre horizontal well spacing unit will overlap the following existing horizontal well spacing unit covering portions of the subject acreage: 240-acre, more or less, horizontal well spacing unit comprised of the E/2 SE/4 of Section 4 and the E/2 E/2 of Section 9, Township 23 South, Range 35 East, dedicated to the Marlan Downey State 04&09-23S-35E AR #114H well (API: 30-025-46255).

The completed interval for each of the wells will comply with statewide setbacks for oil wells. MRC has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
David Johns, Landman	Affidavit	Approx. 8
Blake Herber, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

MRC requests that these matters be consolidated for hearing and intends to present these cases by affidavit if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By:

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State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 202458

QUESTIONS

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	202458
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	