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

APPLICATIONS OF MRC PERMIAN COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NOS. 23746-23748

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

CASE NO. 23749

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

MRC Permian Company ("MRC")

ATTORNEY

Michael H. Feldewert Adam G. Rankin Julia Broggi Paula M. Vance 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

OTHER PARITES

Permian Resources Operating, LLC ("Permian")	Dana S. Hardy Jaclyn M. McLean Hinkle Shanor, LLP P.O. Box 2068 Santa Fe, NM 87504-2068 (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com
Mewbourne Oil Company ("Mewbourne")	James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043 jimbruce487@gmail.com jamesbruc@aol.com

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the Bone Spring (WC-015 G-04 S203032P; BONE SPRING [98008]) formation underlying the referenced acreage all in Township 20 South, Range 30 East, NMPM, Eddy County, New Mexico, as follows:

- Under Case No. 23746, MRC seeks to pool a standard 240-acre, more or less, horizontal well spacing unit comprised of the N/2 N/2 of Section 33 and the N/2 NE/4 of Section 32 and initially dedicate this Bone Spring spacing unit to the proposed Alyson 3332 Fed Com 121H well, to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 33, with a first take point in the NE/4 NE/4 (Unit A) of Section 33 and a last take point in the NW/4 NE/4 (Unit B) of Section 32.
- Under Case No. 23747, MRC seeks to pool a standard 240-acre, more or less, horizontal well spacing unit comprised of the S/2 N/2 of Section 33 and the S/2 NE/4 of Section 32 and initially dedicate this Bone Spring spacing unit to the proposed Alyson 3332 Fed Com

122H well, to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 33, with a first take point in the SE/4 NE/4 (Unit H) of Section 33 and a last take point in the SW/4 NE/4 (Unit G) of Section 32.

Under Case No. 23748, MRC seeks to pool a standard 240-acre, more or less, horizontal well spacing unit comprised of the N/2 S/2 of Section 33 and the N/2 SE/4 of Section 32 and initially dedicate this Bone Spring spacing unit to the proposed Alyson 3332 Fed Com 123H well, to be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 33, with a first take point in the NE/4 SE/4 (Unit I) of Section 33 and a last take point in the NW/4 SE/4 (Unit J) of Section 32.

Under **Case No. 23749**, MRC seeks an order (a) approving the proposed standard overlapping spacing units and (b) pooling all uncommitted interests in the Bone Spring formation underlying the S/2 S/2 of Section 33 and the S/2 SE/4 of Section 32, Township 20 South, Range 30 East, NMPM, Eddy County, New Mexico. MRC seeks to initially dedicate the above-referenced overlapping horizontal well spacing unit to the proposed **Alyson 3332 Fed Com 124H** well to be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 33, with first take point in the SE/4 SE/4 (Unit P) of Section 33 and a last take point SW/4 SE/4 (Unit O) of Section 32. This proposed horizontal well spacing unit will overlap a 40-acre spacing unit comprised of the SE/4 SE/4 (Unit P) of Section 32 that is currently dedicated to the Eddy BD State #1 (30-015-20200), a vertical well completed in the Bone Spring formation.

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 interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Hawks Holder, Landman	Affidavit	Approx. 7
Andrew Parker, 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:

Michael H. Feldewert Adam G. Rankin Julia Broggi Paula M. Vance Post Office Box 2208 Santa Fe, NM 87504 505-988-4421 505-983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com

ATTORNEYS FOR MRC PERMIAN COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Dana S. Hardy Jaclyn M. McLean Hinkle Shanor, LLP P.O. Box 2068 Santa Fe, NM 87504-2068 (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

Attorneys Permian Resources Operating, LLC

James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043 jimbruce487@gmail.com jamesbruc@aol.com

Attorney Mewbourne Oil Company

Pathe V.

Paula M. Vance

District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170 District IV

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3470 Fax: (505) 476-3462

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

QUESTIONS

Page 6 of 6

Action 261080

QUESTIONS

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	261080
	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.	