# 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**

### **ATTORNEY**

MRC Permian Company ("MRC")

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
pmvance@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

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

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** 

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

pmvance@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

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

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

Action 261083

### **QUESTIONS**

| Operator:                  | OGRID:                                   |
|----------------------------|--|
| MATADOR PRODUCTION COMPANY | 228937                                   |
| One Lincoln Centre         | Action Number:                           |
| Dallas, TX 75240           | 261083                                   |
|                            | 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. |  |