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. 23629-23632

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 Michael H. Feldewert ("MRC") Adam G. Rankin

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 pmvance@hollandhart.com

OTHER PARTIES ATTORNEY

COG Operating LLC and Concho Oil & Gas

LLC

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 Elizabeth Ryan
Jobediah Rittenhouse
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
beth.ryan@conocophillips.com
joby.rittenhouse@conocophillips.com

Tap Rock Operating, LLC

Michael Rodriguez 523 Park Point Drive Golden, CO 80401 (720) 245-2606 mdrodriguez@taprk.com

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the Wolfcamp formation underlying the referenced acreage all in Township 24 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

• Under Case No. 23629, MRC seeks an order (a) approving a standard 319.98-acre, more or less, overlapping horizontal well spacing unit in the Wolfcamp formation comprised of Lot 4, SW/4 NW/4, and the W/2 SW/4 of Section 2, and the W/2 W/2 of Section 11, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. MRC seeks to initially dedicate this overlapping horizontal well spacing unit to the proposed Charles Ling Fed Com #221H well, to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 2 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 11. This 319.98-acre horizontal well spacing unit will overlap the following existing horizontal well spacing unit covering portions of the subject acreage:

- 160-acre, more or less, horizontal well spacing unit comprised of the W/2 W/2 of Section 11, Township 24 South, Range 33 East, dedicated to the Charles Ling Fed Com #211H (API: 30-025-45080).
- Under Case No. 23630, MRC seeks an order (a) approving a standard 319.85-acre, more or less, overlapping horizontal well spacing unit in the Wolfcamp formation comprised of Lot 3, SE/4 NW/4, and the E/2 SW/4 of Section 2, and the E/2 W/2 of Section 11, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. MRC seeks to initially dedicate this overlapping horizontal well spacing unit to the proposed Charles Ling Fed Com #222H well, to be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 2 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 11. This 319.85-acre horizontal well spacing unit will overlap the following existing horizontal well spacing unit covering portions of the subject acreage:
 - 160-acre, more or less, horizontal well spacing unit comprised of the E/2 W/2 of Section 11, Township 24 South, Range 33 East, dedicated to the Charles Ling Fed Com #212H (API: 30-025-45081).
- Under Case No. 23631, MRC seeks an order (a) approving a standard 319.73-acre, more or less, overlapping horizontal well spacing unit in the Wolfcamp formation comprised of Lot 2, SW/4 NE/4, and the W/2 SE/4 of Section 2, and the W/2 E/2 of Section 11, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. MRC seeks to initially dedicate this overlapping horizontal well spacing unit to the proposed Charles Ling Fed Com #223H well, to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 2 to a bottom hole location in the SW/4

SE/4 (Unit O) of Section 11. This 319.73-acre horizontal well spacing unit will overlap the following existing horizontal well spacing unit covering portions of the subject acreage:

- 160-acre, more or less, horizontal well spacing unit comprised of the W/2 E/2 of Section 11, Township 24 South, Range 33 East, dedicated to the Charles Ling Fed Com #213H (API: 30-025-45082).
- Under Case No. 23632, MRC seeks an order (a) approving a standard 479.6-acre, more or less, overlapping horizontal well spacing unit in the Wolfcamp formation comprised of Lot 1, SE/4 NE/4, and the E/2 SE/4 of Section 2, and the E/2 E/2 of Sections 11 and 14, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. MRC seeks to initially dedicate this overlapping horizontal well spacing unit to the proposed Charles Ling Fed Com #224H well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 2 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 14. This 479.6-acre horizontal well spacing unit will overlap the following existing horizontal well spacing units covering portions of the subject acreage:
 - O 160-acre, more or less, horizontal well spacing unit comprised of the E/2 E/2 of Section 11, Township 24 South, Range 33 East, dedicated to the Charles Ling Fed Com #214H (API: 30-025-45083); and
 - o 160-acre, more or less, horizontal well spacing unit comprised of the E/2 E/2 of Section 14, Township 24 South, Range 33 East, dedicated to the Strong 14-24S-33E AR (API: 30-025-44442).

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
Nick Weeks, Landman	Affidavit	Approx. 7
Liz Olson, Geologist PRO	Affidavit OCEDURAL MATTERS	Approx. 4

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

Paula M. Vance

Post Office Box 2208

Santa Fe, NM 87504

505-988-4421

505-983-6043

Facsimile

mfeldewert@hollandhart.com

agrankin@hollandhart.com

pmvance@hollandhart.com

ATTORNEYS FOR MRC PERMIAN COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 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

Elizabeth Ryan
Jobediah Rittenhouse
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
beth.ryan@conocophillips.com
joby.rittenhouse@conocophillips.com

Attorneys for COG Operating LLC and Concho Oil & Gas LLC

Michael Rodriguez 523 Park Point Drive Golden, CO 80401 (720) 245-2606 mdrodriguez@taprk.com

Attorney for Tap Rock Operating, LLC

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 270307

QUESTIONS

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	270307
	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.	