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

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

CASE NOS. 24011-24014

## 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

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

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

Under these consolidated cases, MRC seeks orders pooling four standard horizontal well spacing units in a limited interval of the Wolfcamp formation underlying Sections 2, 11, and 14, Township 24 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

- Under Case 24011, MRC seeks to an order pooling a standard 319.98-acre, more or less, horizontal well spacing unit in a limited interval of the Wolfcamp formation underlying Lot 4, SW4NW4, and the W2SW4 (W2W2 equivalent) of irregular Section 2, and the W2W2 of Section 11 to be initially dedicated to the proposed Charles Ling Fed Com 221H, a horizontal well to be drilled from a surface location in the in the NW4NW4 (Unit D) of Section 2 to a bottom hole location in the SW4SW4 (Unit M) of Section 11. This spacing unit will replace the spacing unit sought under Case 23931.
- Under Case 24012, MRC seeks an order pooling a standard 319.85-acre, more or less, overlapping horizontal well spacing unit in a limited interval of the Wolfcamp formation underlying Lot 3, SE4NW4, and the E2SW4 (E2W2 equivalent) of irregular Section 2, and the E2W2 of Section 11 to be initially dedicated to the proposed Charles Ling Fed Com 222H, a horizontal well to be drilled from a surface location in the NE4NW4 (Unit C) of Section 2 to a bottom hole location in the SE4SW4 (Unit N) of Section 11. This spacing unit will replace the spacing unit sought under Case 23932.
- Under Case 24013, MRC seeks an order pooling a standard 319.73-acre, more or less, overlapping horizontal well spacing unit in a limited interval of the Wolfcamp formation underlying Lot 2, SW4NE4, and the W2SE4 (W2E2 equivalent) of irregular Section 2, and the W2E2 of Section 11 to be initially dedicated to the proposed Charles Ling Fed Com 223H, a horizontal well to be drilled from a surface location in the NW4NE4 (Unit B) of Section 2 to a bottom hole location in the SW4SE4 (Unit O) of Section 11. This spacing unit will replace the spacing unit sought under Case 23933.
- Under Case 24014, MRC seeks an order pooling a standard 479.6-acre, more or less, overlapping horizontal well spacing unit in a limited interval of the Wolfcamp formation

underlying Lot 1, SE4NE4, and the E2SE4 (E2E2 equivalent) of irregular Section 2, the E2E2 of Section 11, and the E2E2 of Section 14, to be initially dedicated to the proposed **Charles Ling Fed Com 224H**, a horizontal well to be drilled from a surface location in the NE4NE4 (Unit A) of Section 2 to a bottom hole location in the SE4SE4 (Unit P) of Section 14. This spacing unit will replace the spacing unit sought under Case 23934.

Each of these proposed spacing units are <u>limited in depth</u> to the correlative stratigraphic interval from 12,412' MD as shown in the Dual Laterolog of the Stevens 11 #1 well (API No. 30-025-34246) to the base of the WC-025 G-09 S243310P; Upper Wolfcamp Oil Pool [98135].

MRC has sought and been unable to obtain voluntary agreement for the <u>pooling</u> of these lands from all mineral owners in the subject acreage. However, Matador has provided notice of the overlapping spacing units to all affected working interest owners in the proposed and existing Wolfcamp spacing units and none of the affected working interest owners have objected to the proposed development plan.

#### APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Nick Weeks, Landman	Affidavit	Approx. 7
Liz Olson, Geologist	Affidavit	Approx. 4

## PROCEDURAL MATTERS

MRC requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statements if there is no opposition at the time of hearing. As noted above, these applications seek to create spacing units that will replace those sought under Cases 23931 through 23934, which are currently pending before the Division.

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 November 30, 2023, I served a copy of the foregoing document to the following counsel of record in Cases 23931-23934 via Electronic Mail:

Dana S. Hardy
Jaclyn M. McLean
HINKLE SHANOR LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505) 982-4554
(505) 982-8623 FAX
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com

Attorneys for COG Operating LLC & Concho Oil & Gas LLC

Michael H. Feldewert

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 289714

#### **QUESTIONS**

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	289714
	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.	