# 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. 24215-24218

## 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")

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

EOG Resources, Inc. Jordan L. Kessler

 ("EOG")
 125 Lincoln Avenue, Suite 213

 (Case Nos. 24217 & 24218)
 Santa Fe, New Mexico 87501

(432) 488-6108

jordan\_kessler@eogresources.com

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

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the Bone Spring formation (Malaga; Bone Spring, North [42800]) underlying the referenced acreage as follows:

- Under Case No. 24215, MRC seeks to pool the uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit comprised of the N/2 N/2 of Sections 9 and 10, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico and initially dedicate this Bone Spring spacing unit to the proposed Emmett Fed Com #111H and Emmett Fed Com #121H wells, both to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 10, with a first take point in the NE/4 NE/4 (Unit A) of Section 10 and a last take point in the NW/4 NW/4 (Unit D) of Section 9.
- Under Case No. 24216, MRC seeks to pool the uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit comprised of the S/2 N/2 of Sections 9 and 10, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico and initially dedicate this Bone Spring spacing unit to the proposed Emmett 10&9-24S-28E RB #112H and Emmett 10&9-24S-28E RB #122H wells, both to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 10, with a first take point in the SE/4 NE/4 (Unit H) of Section 10 and a last take point in the SW/4 NW/4 (Unit E) of Section 9.
- Under Case No. 24217, MRC seeks to pool the uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit comprised of the N/2 S/2 of Sections 9 and 10, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico and initially dedicate this Bone Spring spacing unit to the proposed Prater 10&9-24S-28E RB #113H and Prater 10&9-24S-28E RB #123H wells, both to be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 10, with a first take point in the NE/4 SE/4 (Unit I) of Section 10 and a last take point in the NW/4 SW/4 (Unit L) of Section 9.

Under Case No. 24218, MRC seeks to pool the uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit comprised of the S/2 S/2 of Sections 9 and 10, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico and initially dedicate this Bone Spring spacing unit to the proposed Prater 10&9-24S-28E RB #114H and Prater 10&9-24S-28E RB #124H wells, both to be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 10, with a first take point in the SE/4 SE/4 (Unit P) of Section 10 and a last take point in the SW/4 SW/4 (Unit M) of Section 9.

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
Hanna Bollenbach, Landman	Affidavit	Approx. 5
Daniel Brugioni, Geologist	Affidavit	Approx. 3

## **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** 

Bv:

Michael H. Feldewert Adam G. Rankin Paula M. Vance Post Office Box 2208 Santa Fe, NM 87504 505-988-4421 505-983-6043 Facsimile

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 March 14, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Jordan L. Kessler EOG RESOURCES, INC. 125 Lincoln Avenue, Suite 213 Santa Fe, New Mexico 87501 (432) 488-6108 Jordan kessler@eogresources.com

Attorney for EOG Resources, Inc.

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 323192

#### **QUESTIONS**

Operator:		OGRID:	
	MATADOR PRODUCTION COMPANY	228937	
	One Lincoln Centre	Action Number:	
	Dallas, TX 75240	323192	
	[	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.	