

**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. 25183 & 25184

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

ATTORNEY

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

APPLICANT'S STATEMENT OF THE CASES

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the Bone Spring formation (MESCALERO ESCARPE; BONE SPRING [45793]) in the following proposed horizontal well spacing units underlying Sections 3 and 4, Township 18 South, Range 33 East, NMPM, Lea County, New Mexico:

- Under **Case No. 25183**, MRC seeks to pool a standard 320-acre, more or less, horizontal well spacing unit underlying the N/2 S/2 of Sections 3 and 4 to be initially dedicated to the proposed **Noel 0304 Fed Com 123H** well, to be horizontally drilled from a surface location

in the SW/4 of Section 4, with a first take point in the NW/4 SW/4 (Unit L) of Section 4 and a last take point in the NE/4 SE/4 (Unit I) of Section 3; and

- Under **Case No. 25184**, MRC seeks to pool a standard 320-acre, more or less, horizontal well spacing unit underlying the S/2 S/2 of Sections 3 and 4 to be initially dedicated to the proposed **Noel 0304 Fed Com 124H** well, to be horizontally drilled from a surface location in the SW/4 of Section 4, with a first take point in the SW/4 SW/4 (Unit M) of Section 4 and a last take point in the SE/4 SE/4 (Unit P) of Section 3.

The completed interval for 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
Ehtan Frasier, Landman	Self-Affirmed Statement	Approx. 4
Joshua Burrus, Geologist	Self-Affirmed Statement	Approx. 3

PROCEDURAL MATTERS

MRC does not anticipate opposition to these matters and requests that they be consolidated for a hearing by self-affirmed statements.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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
agrarkin@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR MRC PERMIAN COMPANY

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 439724

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 439724
	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.