# 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. 23362 & 23363

## MRC PERMIAN COMPANY'S CONSOLIDATED PRE-HEARING STATEMENT

MRC Permian Company ("MRC" or "Applicant"), the applicant in the above-referenced matter, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

### **APPEARANCES**

#### **APPLICANT**

#### **ATTORNEY**

Michael H. Feldewert

MRC Permian Company ("MRC")

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

### APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, MRC seeks an order pooling all uncommitted interests in the Bone Spring formation (Hackberry; Bone Spring, North [97056]) in the following spacing units: underlying the referenced acreage all in Township 19 South, Range 28 East, NMPM, Eddy County, New Mexico, as follows:

- Under Case No. 23362, MRC seeks to pool a standard 360-acre, more or less, horizontal well spacing unit comprised of the N/2 SE/4 of Section 3, the N/2 S/2 of Section 2, and the N/2 SW/4 and NW/4 SE/4 of Section 1, Township 19 South, Range 31 East, Eddy County, New Mexico. MRC proposes to dedicate the above-referenced spacing unit to the proposed initial Jimmy Anderson 0301 Fed Com 123H well to be drilled from a surface location in the SW/4 SE/4 of Section 3 (Unit O) to a bottom hole location in the NW/4 SE/4 (Unit J) of Section 1.
- Under Case No. 23363, MRC seeks to pool a standard 400-acre, more or less, horizontal well spacing unit comprised of the S/2 SE/4 of Section 3 and the S/2 S/2 of Sections 2 and 1, Township 19 South, Range 31 East, Eddy County, New Mexico. MRC proposes to dedicate the above-referenced spacing unit to the proposed initial Jimmy Anderson 0301 Fed Com 124H well to be drilled from a surface location in the SW/4 SE/4 of Section 3 (Unit O) to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 1.

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 interest owners in the subject acreage.

## **APPLICANT'S PROPOSED EVIDENCE**

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Nicholas Weeks, 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** 

By:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR MRC PERMIAN COMPANY

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 189965

### **QUESTIONS**

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	189965
	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.	