

**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. 23746-23748

**APPLICATION OF MRC PERMIAN
COMPANY FOR APPROVAL OF AN
OVERLAPPING HORIZONTAL WELL SPACING
UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 23749

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
("MRC")

ATTORNEY

Michael H. Feldewert
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
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

OTHER PARTIES

Permian Resources Operating, LLC
("Permian")

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

Mewbourne Oil Company ("Mewbourne")

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jimbruce487@gmail.com
jamesbruc@aol.com

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the Bone Spring (WC-015 G-04 S203032P; BONE SPRING [98008]) formation underlying the referenced acreage all in Township 20 South, Range 30 East, NMPM, Eddy County, New Mexico, as follows:

- Under **Case No. 23746**, MRC seeks to pool a standard 240-acre, more or less, horizontal well spacing unit comprised of the N/2 N/2 of Section 33 and the N/2 NE/4 of Section 32 and initially dedicate this Bone Spring spacing unit to the proposed **Alyson 3332 Fed Com 121H** well, to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 33, with a first take point in the NE/4 NE/4 (Unit A) of Section 33 and a last take point in the NW/4 NE/4 (Unit B) of Section 32.
- Under **Case No. 23747**, MRC seeks to pool a standard 240-acre, more or less, horizontal well spacing unit comprised of the S/2 N/2 of Section 33 and the S/2 NE/4 of Section 32 and initially dedicate this Bone Spring spacing unit to the proposed **Alyson 3332 Fed Com**

122H well, to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 33, with a first take point in the SE/4 NE/4 (Unit H) of Section 33 and a last take point in the SW/4 NE/4 (Unit G) of Section 32.

- Under **Case No. 23748**, MRC seeks to pool a standard 240-acre, more or less, horizontal well spacing unit comprised of the N/2 S/2 of Section 33 and the N/2 SE/4 of Section 32 and initially dedicate this Bone Spring spacing unit to the proposed **Alyson 3332 Fed Com 123H** well, to be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 33, with a first take point in the NE/4 SE/4 (Unit I) of Section 33 and a last take point in the NW/4 SE/4 (Unit J) of Section 32.

Under **Case No. 23749**, MRC seeks an order (a) approving the proposed standard overlapping spacing units and (b) pooling all uncommitted interests in the Bone Spring formation underlying the S/2 S/2 of Section 33 and the S/2 SE/4 of Section 32, Township 20 South, Range 30 East, NMPM, Eddy County, New Mexico. MRC seeks to initially dedicate the above-referenced overlapping horizontal well spacing unit to the proposed **Alyson 3332 Fed Com 124H** well to be horizontally drilled from a surface hole location in the SE/4 SE/4 (Unit P) of Section 33, with first take point in the SE/4 SE/4 (Unit P) of Section 33 and a last take point SW/4 SE/4 (Unit O) of Section 32. This proposed horizontal well spacing unit will overlap a 40-acre spacing unit comprised of the SE/4 SE/4 (Unit P) of Section 32 that is currently dedicated to the Eddy BD State #1 (30-015-20200), a vertical well completed in the Bone Spring formation.

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
Hawks Holder, 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
505-988-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR MRC PERMIAN COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 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

Attorneys Permian Resources Operating, LLC

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jimbruce487@gmail.com
jamesbruc@aol.com

Attorney Mewbourne Oil Company



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
District IV
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 261082

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 261082
	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.