

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION COMMISSION**

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

**CASE NOS. 25247-25248,
25250, & 25252-25254**

RESPONSE TO MOTION TO STRIKE

MRC Permian Company (“MRC”) hereby submits this response to American Energy Resources, LLC’s (“American Energy”) motion to strike.

An operator that operates more than a thousand wells is out of compliance if the operator has more than ten wells that have not been properly plugged and abandoned in accordance with 19.15.25.8 NMAC. *See* 19.15.5.9(A)(4)(d) NMAC. The Division “makes available on its website, and update[s] daily, an ‘inactive well list.’” 19.15.5.9(B)(1) NMAC.

Matador Production Company (OGRID No. 228937) (“Matador”) is an affiliate of MRC and is the designated operator of its wells. The Division’s records show that Matador currently operates 1,749 wells in New Mexico and has six wells listed on the Division’s Inactive Well List. *See Exhibit A.* Matador is therefore in compliance with the Division rules and has standing to file the above-captioned pooling applications. If the Division has concerns about any of the wells that Matador operates, Matador is available to discuss and engage with the Division.

WHEREFORE, MRC respectfully requests that American Energy’s motion to strike be denied by the Division.

Respectfully submitted,

Holland & Hart, LLP

A handwritten signature in blue ink, appearing to read "P. Vance", is positioned above a horizontal line.

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

**ATTORNEYS FOR MRC PERMIAN COMPANY AND
MATADOR PRODUCTION COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Jonathan Samaniego
P.O. Box 114
Hagerman, NM 88232
energy.jrs@gmail.com

Representative of American Energy Resources, LLC

A handwritten signature in blue ink, appearing to read "Paula M. Vance", is written over a horizontal line.

Paula M. Vance

EXHIBIT

A

Inactive Well List

Total Well Count: 1749 Inactive Well Count: 6
Printed On: Tuesday, May 20 2025

District	API	Well	ULSTR	OCD Unit	Ogrid	Operator	Lease Type	Surface Owner	Well Type	Last Production	Formation/Notes	Status	TA Exp Date
1	30-025-29981	CAVINESS 10 FEDERAL #003	H-10-18S-33E	H	228937	MATADOR PRODUCTION COMPANY	F	P	O	08/2023			
2	30-015-20200	EDDY BD STATE #001	P-32-20S-30E	P	228937	MATADOR PRODUCTION COMPANY	S	P	G	07/2022	STRAWN		
1	30-025-26898	FEDERAL HM 13 #001	C-13-21S-32E	C	228937	MATADOR PRODUCTION COMPANY	F	F	G	07/2023	MORROW		
2	30-015-25778	HALE 11 FEDERAL #001	K-11-19S-30E	K	228937	MATADOR PRODUCTION COMPANY	F	F	O	09/2019			
2	30-015-22960	HANNIFIN FEDERAL #002	E-01-19S-31E	E	228937	MATADOR PRODUCTION COMPANY	F	F	G	06/2023			
1	30-025-26427	HAT MESA #001	D-10-21S-32E	D	228937	MATADOR PRODUCTION COMPANY	F	F	O	05/2022	DELAWARE	T	9/29/2024

WHERE Operator:228937, County:All, District:All, Township:All, Range:All, Section:All, Production(months):15, Excludes Wells Under ACOI, Excludes Wells in Approved TA Period