

**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. 23489–23492

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

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APPLICANT’S STATEMENT OF THE CASE

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the Bone Spring formation (Carlsbad; Bone Spring East [96144]) underlying the referenced acreage all in Township 21 South, Range 27 East, NMPM, Eddy County, New Mexico, as follows:

- Under **Case No. 23489**, MRC seeks to pool a standard 320-acre, more or less, horizontal well spacing unit comprised of the N/2 N/2 of Sections 25 and 26 and initially dedicate this Bone Spring spacing unit to the proposed **Whitby 2526 Fed Com #121H** well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 25 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 26.
- Under **Case No. 23490**, MRC seeks to pool a standard 320-acre, more or less, horizontal well spacing unit comprised of the S/2 N/2 of Sections 25 and 26 and initially dedicate this Bone Spring spacing unit to the proposed **Whitby 2526 Fed Com #122H** well, to be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 25 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 26.
- Under **Case No. 23491**, MRC seeks to pool a standard 320-acre, more or less, horizontal well spacing unit comprised of the N/2 S/2 of Sections 25 and 26 and initially dedicate this Bone Spring spacing unit to the proposed **Whitby 2526 Fed Com #123H** well, to be horizontally drilled from a surface location in the NE/4 SE/4 (Unit I) of Section 25 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 26.
- Under **Case No. 23492**, MRC seeks to pool a standard 320-acre, more or less, horizontal well spacing unit comprised of the S/2 S/2 of Sections 25 and 26 and initially dedicate this Bone Spring spacing unit to the proposed **Whitby 2526 Fed Com #124H** well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 25 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 26.

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 working 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: 

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QUESTIONS

Action 211270

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 211270
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>