

**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**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
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 211273

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 211273
	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.