

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

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

CASE NOS. 23629–23632

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
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
pmvance@hollandhart.com

OTHER PARTIES

COG Operating LLC and Concho Oil & Gas
LLC

ATTORNEY

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

Elizabeth Ryan
Jobediah Rittenhouse
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
beth.ryan@conocophillips.com
joby.rittenhouse@conocophillips.com

Tap Rock Operating, LLC

Michael Rodriguez
523 Park Point Drive
Golden, CO 80401
(720) 245-2606
mdrodriguez@taprk.com

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the Wolfcamp formation underlying the referenced acreage all in Township 24 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

- Under **Case No. 23629**, MRC seeks an order (a) approving a standard 319.98-acre, more or less, overlapping horizontal well spacing unit in the Wolfcamp formation comprised of Lot 4, SW/4 NW/4, and the W/2 SW/4 of Section 2, and the W/2 W/2 of Section 11, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. MRC seeks to initially dedicate this overlapping horizontal well spacing unit to the proposed **Charles Ling Fed Com #221H** well, to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 2 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 11. This 319.98-acre horizontal well spacing unit will overlap the following existing horizontal well spacing unit covering portions of the subject acreage:

- 160-acre, more or less, horizontal well spacing unit comprised of the W/2 W/2 of Section 11, Township 24 South, Range 33 East, dedicated to the Charles Ling Fed Com #211H (API: 30-025-45080).
- Under **Case No. 23630**, MRC seeks an order (a) approving a standard 319.85-acre, more or less, overlapping horizontal well spacing unit in the Wolfcamp formation comprised of Lot 3, SE/4 NW/4, and the E/2 SW/4 of Section 2, and the E/2 W/2 of Section 11, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. MRC seeks to initially dedicate this overlapping horizontal well spacing unit to the proposed **Charles Ling Fed Com #222H** well, to be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 2 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 11. This 319.85-acre horizontal well spacing unit will overlap the following existing horizontal well spacing unit covering portions of the subject acreage:
 - 160-acre, more or less, horizontal well spacing unit comprised of the E/2 W/2 of Section 11, Township 24 South, Range 33 East, dedicated to the Charles Ling Fed Com #212H (API: 30-025-45081).
- Under **Case No. 23631**, MRC seeks an order (a) approving a standard 319.73-acre, more or less, overlapping horizontal well spacing unit in the Wolfcamp formation comprised of Lot 2, SW/4 NE/4, and the W/2 SE/4 of Section 2, and the W/2 E/2 of Section 11, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. MRC seeks to initially dedicate this overlapping horizontal well spacing unit to the proposed **Charles Ling Fed Com #223H** well, to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 2 to a bottom hole location in the SW/4

SE/4 (Unit O) of Section 11. This 319.73-acre horizontal well spacing unit will overlap the following existing horizontal well spacing unit covering portions of the subject acreage:

- 160-acre, more or less, horizontal well spacing unit comprised of the W/2 E/2 of Section 11, Township 24 South, Range 33 East, dedicated to the Charles Ling Fed Com #213H (API: 30-025-45082).
- Under **Case No. 23632**, MRC seeks an order (a) approving a standard 479.6-acre, more or less, overlapping horizontal well spacing unit in the Wolfcamp formation comprised of Lot 1, SE/4 NE/4, and the E/2 SE/4 of Section 2, and the E/2 E/2 of Sections 11 and 14, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. MRC seeks to initially dedicate this overlapping horizontal well spacing unit to the proposed **Charles Ling Fed Com #224H** well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 2 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 14. This 479.6-acre horizontal well spacing unit will overlap the following existing horizontal well spacing units covering portions of the subject acreage:
 - 160-acre, more or less, horizontal well spacing unit comprised of the E/2 E/2 of Section 11, Township 24 South, Range 33 East, dedicated to the Charles Ling Fed Com #214H (API: 30-025-45083); and
 - 160-acre, more or less, horizontal well spacing unit comprised of the E/2 E/2 of Section 14, Township 24 South, Range 33 East, dedicated to the Strong 14-24S-33E AR (API: 30-025-44442).

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
Nick Weeks, Landman	Affidavit	Approx. 7
Liz Olson, 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
 Paula M. Vance
 Post Office Box 2208
 Santa Fe, NM 87504
 505-988-4421
 505-983-6043 Facsimile
 mfeldewert@hollandhart.com
 agrankin@hollandhart.com
 pmvance@hollandhart.com

ATTORNEYS FOR MRC PERMIAN COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 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

Elizabeth Ryan
Jobediah Rittenhouse
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
beth.ryan@conocophillips.com
joby.rittenhouse@conocophillips.com

***Attorneys for COG Operating LLC and
Concho Oil & Gas LLC***

Michael Rodriguez
523 Park Point Drive
Golden, CO 80401
(720) 245-2606
mdrodriguez@taprk.com

Attorney for Tap Rock Operating, LLC



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 270313

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 270313
	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>