

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

**APPLICATION OF MRC PERMIAN COMPANY
FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.**

CASE NO. 23782

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

CASE NO. 23783

**APPLICATION OF MRC PERMIAN COMPANY
FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.**

CASE NO. 23784

**APPLICATION OF MRC PERMIAN COMPANY
FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.**

CASE NO. 23785

APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT

MRC Permian Company ("MRC"), 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

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Paul 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

Marathon Oil Permian LLC

ATTORNEY

Earl E. DeBrine, Jr.
Deana Bennett
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
earl.debrine@modrall.com
deana.bennett@modrall.com

APPLICANT'S STATEMENT OF THE CASE

In these consolidated matters, MRC seeks orders addressing proposed horizontal well spacing units in the Bone Spring and Wolfcamp formations underlying the Sections 16 and 21, Township 18 South, Range 34 East, NMPM, Lea County, New Mexico, as follows:

- Under Case 23782, MRC seeks an order pooling a standard 320-acre, more or less, horizontal well spacing unit in the Bone Spring formation underlying W2E2 of Sections 16 and 21 to be initially dedicated to the proposed **Iggles State Com 123H** and **Iggles State Com 133H** wells to be horizontally drilled from surface locations in the SE4 of Section 21, with first take points in the SW4SE4 (Unit O) of Section 21 and last take points in the NW4NE4 (Unit B) of Section 16.
- Under Case 23783, MRC seeks an order approving and pooling an overlapping 320-acre, more or less, standard horizontal well spacing unit in the Bone Spring formation underlying the E2E2 of Sections 16 and 21 to be initially dedicated to the proposed **Iggles State Com 124H** and **Iggles State Com 134H** wells to be horizontally drilled from surface locations in the SE4 of Section 21, with first take points in the SE4SE4 (Unit P) of Section 21 and last take points in the NE4NE4 (Unit A) of Section 16. This standard 320-acre horizontal well spacing unit will overlap a 40-acre vertical well spacing unit comprised of the

NE4NE4 (Unit A) of Section 16 that is currently dedicated to the TP State No. 1 well (API No. 30-15-20597) operated by Maverick Permian LLC.

- Under Case 23784, MRC seeks an order pooling a standard 320-acre, more or less, horizontal well spacing unit in the Wolfcamp formation underlying W2E2 of Sections 16 and 21 to be initially dedicated to the proposed **Iggles State Com 243H** well to be horizontally drilled from a surface location in the SE4 of Section 21, with first take points in the SW4SE4 (Unit O) of Section 21 and last take points in the NW4NE4 (Unit B) of Section 16.
- Under Case 23785, MRC seeks an order pooling an overlapping 320-acre, more or less, standard horizontal well spacing unit in the Wolfcamp formation underlying the E2E2 of Sections 16 and 21 to be initially dedicated to the proposed **Iggles State Com 244H** well to be horizontally drilled from surface locations in the SE4 of Section 21, with first take points in the SE4SE4 (Unit P) of Section 21 and last take points in the NE4NE4 (Unit A) of Section 16.

Applicant has sought but been unable to obtain voluntary agreement for the development of this acreage from all affected mineral interest owners.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Clay Wooten, Landman	Affidavit	Approx. 6
Andrew Parker, Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

MRC intends to present these matters by self-affirmed statements in a consolidated fashion if they are unopposed at the time of the hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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

ATTORNEYS FOR MRC PERMIAN COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Earl E. DeBrine, Jr.
Deana Bennett
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
earl.debrine@modrall.com
deana.bennett@modrall.com

Attorney for Marathon Oil Permian LLC



Michael H. Feldewert

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 270005

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 270005
	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>