

**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**

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**OTHER PARTIES**

Marathon Oil Permian LLC

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**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**

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

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**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:

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