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 agrankin@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 <u>Case 23782</u>, 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 <u>Case 23783</u>, 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 <u>Case 23784</u>, 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 <u>Case 23785</u>, 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

what 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 agrankin@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

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

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Action 270009

QUESTIONS

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	270009
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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