

**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. 24215-24218**

**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")

EOG Resources, Inc.  
("EOG")  
(Case Nos. 24217 & 24218)

**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

Jordan L. Kessler  
125 Lincoln Avenue, Suite 213  
Santa Fe, New Mexico 87501  
(432) 488-6108  
jordan\_kessler@eogresources.com

**APPLICANT'S STATEMENT OF THE CASE**

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the Bone Spring formation (Malaga; Bone Spring, North [42800]) underlying the referenced acreage as follows:

- Under **Case No. 24215**, MRC seeks to pool the uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit comprised of the N/2 N/2 of Sections 9 and 10, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico and initially dedicate this Bone Spring spacing unit to the proposed **Emmett Fed Com #111H** and **Emmett Fed Com #121H** wells, both to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 10, with a first take point in the NE/4 NE/4 (Unit A) of Section 10 and a last take point in the NW/4 NW/4 (Unit D) of Section 9.
- Under **Case No. 24216**, MRC seeks to pool the uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit comprised of the S/2 N/2 of Sections 9 and 10, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico and initially dedicate this Bone Spring spacing unit to the proposed **Emmett 10&9-24S-28E RB #112H** and **Emmett 10&9-24S-28E RB #122H** wells, both to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 10, with a first take point in the SE/4 NE/4 (Unit H) of Section 10 and a last take point in the SW/4 NW/4 (Unit E) of Section 9.
- Under **Case No. 24217**, MRC seeks to pool the uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit comprised of the N/2 S/2 of Sections 9 and 10, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico and initially dedicate this Bone Spring spacing unit to the proposed **Prater 10&9-24S-28E RB #113H** and **Prater 10&9-24S-28E RB #123H** wells, both to be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 10, with a first take point in the NE/4 SE/4 (Unit I) of Section 10 and a last take point in the NW/4 SW/4 (Unit L) of Section 9.

- Under **Case No. 24218**, MRC seeks to pool the uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit comprised of the S/2 S/2 of Sections 9 and 10, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico and initially dedicate this Bone Spring spacing unit to the proposed **Prater 10&9-24S-28E RB #114H** and **Prater 10&9-24S-28E RB #124H** wells, both to be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 10, with a first take point in the SE/4 SE/4 (Unit P) of Section 10 and a last take point in the SW/4 SW/4 (Unit M) of Section 9.

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 interest owners in the subject acreage.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Hanna Bollenbach, Landman	Affidavit	Approx. 5
Daniel Brugioni, Geologist	Affidavit	Approx. 3

**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  
agrarkin@hollandhart.com  
pmvance@hollandhart.com

**ATTORNEYS FOR MRC PERMIAN COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Jordan L. Kessler  
EOG RESOURCES, INC.  
125 Lincoln Avenue, Suite 213  
Santa Fe, New Mexico 87501  
(432) 488-6108  
*Jordan\_kessler@eogresources.com*

*Attorney for EOG Resources, Inc.*



---

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 323187

**QUESTIONS**

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 323187
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>