

**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

ATTORNEY

MRC Permian Company
 (“MRC”)

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

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

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

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
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 323195

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 323195
	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>