

**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. 24485

APPLICANT'S PRE-HEARING STATEMENT

MRC Permian Company, the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

MRC Permian Company

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

APPLICANT'S STATEMENT OF THE CASE

Applicant seeks an order pooling all uncommitted interests in standard 480-acre, more or less, horizontal well spacing unit in the upper Pennsylvanian Shale [Dean Permo Upper Penn Pool (16720)] underlying the E2W2 of Sections 24, 25 and 36, Township 15 South, Range 36 East, NMPM, Lea County, New Mexico. Said unit will be initially dedicated to the proposed **Gaines Baty State Com 242H** well to be horizontally drilled from a surface location in the SW4 of Section

36, with a first take point in the SE4SW4 (Unit N) of Section 36 and a last take point in the NE4NW4 (Unit C) of Section 24.

Applicant seeks to have Matador Production Company (OGRID No. 228937) designated as the operator of these proposed spacing units and been unable to obtain voluntary agreement for development of this acreage from all of the mineral interest owners.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Addison Costly, Landman	Self-Affirmed Statement	Approx. 5
Andrew Parker, Geologist	Self-Affirmed Statement	Approx. 3

PROCEDURAL MATTERS

Applicant intends to present this case by self-affirmed statements 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 Facimile
 mfeldewert@hollandhart.com
 agrankin@hollandhart.com
 pmvance@hollandhart.com

ATTORNEYS FOR MRC PERMIAN COMPANY

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 351336

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 351336
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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