

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATIONS OF MRC PERMIAN COMPANY
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 24613-24615

APPLICANT’S CONSOLIDATED PRE-HEARING STATEMENT

MRC Permian Company, 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
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

In these consolidated cases, Applicant seeks orders pooling all uncommitted interests in Bone Spring and Wolfcamp formations underlying the W2 of Sections 20, 29 and 32, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico, as follows:

- **Case 24613** seeks to pool as standard 960-acre horizontal well spacing unit in the Bone Spring formation under the W2 of Sections 20, 29 and 32 to be initially dedicated to the proposed **K. Stewart Fed Com 135H** well, to be horizontally drilled from a surface

location in the S2SW4 of Section 32, with a first take point in the SW4SW4 (Unit M) of Section 32 and a last take point in the NW4NW4 (Unit D) of Section 20. The completed interval of the K. Stewart Fed Com 135H is expected to remain within 330 feet of the adjoining quarter-quarter section (or equivalent) tracts to allow inclusion of these proximity tracts within the proposed horizontal spacing unit under 19.15.16.15.B(1)(b) NMAC.

- **Case 24614** seeks to pool a standard 480-acre horizontal well spacing unit in the Wolfcamp formation under the W2W2 of Sections 20, 29 and 32 to be initially dedicated to the proposed **K. Stewart Fed Com 211H** well, to be horizontally drilled from a surface location in the S2SW4 of Section 32, with a first take point in the SW4SW4 (Unit M) of Section 32 and a last take point in the NW4NW4 (Unit D) of Section 20.
- **Case 24615** seeks to pool a standard 480-acre horizontal well spacing unit in the Wolfcamp formation under the E2W2 of Sections 20, 29 and 32 to be initially dedicated to the proposed **K. Stewart Fed Com 212H** well, to be horizontally drilled from a surface location in the S2SW4 of Section 32, with a first take point in the SE4SW4 (Unit N) of Section 32 and a last take point in the NE4NW4 (Unit C) of Section 20.

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 the affected mineral interest owners.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
David Johns, Landman	Self-Affirmed Statement	Approx. 5 for each case
Blake Herber, Geologist	Self-Affirmed Statement	Approx. 3 for each case

PROCEDURAL MATTERS

Applicant intends to present these cases in a consolidated fashion 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 Facsimile
mfeldewert@hollandhart.com
agrarkin@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 365295

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 365295
	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>