

**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. 24620-24621**

**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”)

**ATTORNEY**

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**APPLICANT’S STATEMENT OF THE CASE**

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the Bone Spring formation (Carlsbad; BS, East [96144]) underlying the referenced acreage as follows:

- Under **Case No. 24620**, 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 21 and 22, Township 21 South, Range 27 East, NMPM, Eddy County, New Mexico and

initially dedicate this Bone Spring spacing unit to the proposed **Bill Wilshusen 2221 Fed Com #121H** well, to be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 22, with a first take point in the NE/4 NE/4 (Unit A) of Section 22 and a last take point in the NW/4 NW/4 (Unit D) of Section 21.

- Under **Case No. 24621**, 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 21 and 22, Township 21 South, Range 27 East, NMPM, Eddy County, New Mexico and initially dedicate this Bone Spring spacing unit to the proposed **Bill Wilshusen Fed Com #122H** well, to be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 22, with a first take point in the SE/4 NE/4 (Unit H) of Section 22 and a last take point in the SW/4 NW/4 (Unit E) of Section 21.

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>
Hawks Holder, Landman	Self-Affirmed Statement	Approx. 5
Andrew Parker, Geologist	Self-Affirmed Statement	Approx. 3

**PROCEDURAL MATTERS**

MRC requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By:  \_\_\_\_\_

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
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QUESTIONS

Action 369348

**QUESTIONS**

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 369348
	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	Not answered.
Testimony time (in minutes)	Not answered.