

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

**APPLICATIONS OF PERMIAN RESOURCES
OPERATING, LLC FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

**CASE NOS. 24917-24918
24440-24442
24451-24453
& 24455**

**APPLICATIONS OF MRC PERMIAN COMPANY FOR
APPROVAL OF STANDARD OVERLAPPING HORIZONTAL
WELL SPACING UNITS AND COMPULSORY POOLING,
EDDY AND LEA COUNTIES, NEW MEXICO.**

CASE NOS. 24902-24904, 24906

**APPLICATIONS OF MRC PERMIAN COMPANY
FOR COMPULSORY POOLING,
EDDY AND LEA COUNTIES, NEW MEXICO.**

CASE NOS. 24907, 24909- 24911

**PERMIAN RESOURCES OPERATING, LLC AND MRC PERMIAN COMPANY'S
JOINT MOTION TO DISMISS AND VACATE THE
NOVEMBER 5, 2024 CONTESTED HEARING**

Permian Resources Operating, LLC ("PRO") and MRC Permian Company ("MRC") requests that the New Mexico Oil Conservation Division ("Division") issue an order dismissing Case Nos. 24917, 24918, 24440-24442, 24451-24453, 24455, 24902-24904, 24906, 24907, 24909-24911, and vacating the November 5, 2024 contested hearing. In support of this motion, PRO and MRC state the following:

1. PRO filed its applications in Case Nos. 24440-24442, 24451-24453, and 24455 on April 2, 2024. Although Case Nos. 24161 and 24162 were initially consolidated with these

matters for hearing, PRO has filed a motion to dismiss those cases and filed replacement applications on October 4, 2024. Those applications have been assigned Case Nos. 24917-24918.

2. MRC filed competing pooling applications for the Twinkle Fed Com wells on October 1, 2024. Those applications have been assigned Case Nos. 24902-24904, 24906, 24907, and 24909 – 24911.

3. PRO filed its *Unopposed Motion to Amend Pre-Hearing Order and Reschedule November 5, 2024 Contested Hearing* on October 10, 2024, requesting that the contested hearing set for November 5th be vacated to allow the parties additional time to negotiate and prepare for a contested hearing.

4. The Hearing Examiner notified the parties that he had reviewed the *Unopposed Motion to Amend Pre-Hearing Order and Reschedule November 5, 2024 Contested Hearing*, and was denying the request to postpone the contested hearing date.

5. The competing development plans in PRO and MRC's cases involve large areas, multiple formations, potash drill islands, and numerous wells. Accordingly, it is in the best interest of the parties, and will conserve resources of the Division, to allow the parties additional time to evaluate the competing proposals and negotiate before proceeding to a contested hearing.

6. As a result, PRO and MRC request that the Division dismiss Case Nos. 24917, 24918, 24440-24442, 24451-24453, 24455, 24902-24904, 24906, 24907, 24909-24911 and vacate the November 5, 2024 contested hearing.

7. Counsel for Coterra Energy, Inc., was contacted and does not oppose this motion.

For the foregoing reasons, PRO and MRC request that the Division issue an order: (1) Case Nos. 24917, 24918, 24440-24442, 24451-24453, 24455, 24902-24904, 24906, 24907,

24909-24911; and (2) vacating the November 5, 2024 contested hearing.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Jaclyn M. McLean

Dana S. Hardy

Jaclyn M. McLean

Dylan M. Villescascas

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

dvillescascas@hinklelawfirm.com

Counsel for Permian Resources Operating, LLC

HOLLAND & HART LLP

Electronic approval 10/14/24

Michael H. Feldewert

Adam G. Rankin

Paula M. Vance

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043

mfeldewert@hollandhart.com

agrarkin@hollandhart.com

pmvance@hollandhart.com

Counsel for MRC Permian Company

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2024, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com
Counsel for MRC Permian Company

Darin Savage
Andrew D. Schill
William E. Zimsky
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com
*Counsel for Coterra Energy, Inc., and subsidiaries
including Cimarex Energy Co. in Cases 24440 – 24442*

/s/ Jaclyn M. McLean
Jaclyn M. McLean