# 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. 24322 & 24323

# APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT

MRC Permian Company ("MRC"), the applicant in the above-referenced matters, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

## **APPEARANCES**

# <u>APPLICANT</u> <u>ATTORNEY</u>

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### OTHER PARTIES <u>ATTORNEY</u>

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## **APPLICANT'S STATEMENT OF THE CASE**

In these consolidated matters, MRC seeks orders pooling standard 320-acre, more or less, horizontal well spacing units in the Bone Spring formation underlying the S2 of Sections 32 and 33, Township 17 South, Range 30 East, NMPM, Eddy County, New Mexico, as follows:

- <u>Case 24322</u> seeks an order pooling the N2S2 of Sections 32 and 33 to be initially dedicated to the proposed **Coach Joe 3332 Fed Com 123H** well to be horizontally drilled from a surface location in the SW4 of Section 34, with a first take point in the NW4SE4 (Unit I) of Section 33 and a last take point in the NW4SW4 (Unit L) of Section 32, and
- <u>Case 24323</u> seeks an order pooling the S2S2 of Sections 32 and 33 to be initially dedicated to the proposed **Coach Joe 3332 Fed Com 124H** well to be horizontally drilled from a surface location in the SW4 of Section 34, with a first take point in the SE4SE4 (Unit P) of Section 33 and a last take point in the SW4SW4 (Unit M) of Section 32.

Applicant has sought but been unable to obtain voluntary agreement for the development of this acreage from all affected mineral owners in this acreage.

#### APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS	
Hawks Holder, Landman	Self-Affirmed Statement	Approx. 6	
Andrew Parker, Geologist	Self-Affirmed Statement	Approx. 3	

### **PROCEDURAL MATTERS**

MRC does not anticipate any opposition to these cases and therefore intends to present them in a consolidated fashion by self-affirmed statements.

Respectfully submitted,

**HOLLAND & HART LLP** 

By:

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ATTORNEYS FOR MRC PERMIAN COMPANY

# **CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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QUESTIONS

Action 341760

#### **QUESTIONS**

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	341760
	Action Type:
l l	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

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