## HSSTATE 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") submits this consolidated pre-hearing statement pursuant to the rules of the Oil Conservation Division.

## **APPEARANCES**

APPLICANT
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# STATEMENT OF THE CASE

In these consolidated cases, MRC seeks orders pooling two standard 320-acre 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:

- Under Case 24322, MRC seeks to pool 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.
- Under Case 24323, MRC seeks to pool 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.

MRC has sought but been unable to obtain a voluntary agreement with all the affected mineral interest owners for the development of the subject acreage.

### **APPLICANT'S PROPOSED EVIDENCE**

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Hawks Holder, Landman	Self-Affirmed Statement	Approx. 5
Joshua Burrus, Geologist	Self-Affirmed Statement	Approx. 3

#### PROCEDURAL MATTERS

MRC does not expect opposition to the requested relief and intends to present these matters by self-affirmed statements in a consolidated fashion.

Respectfully submitted,

**HOLLAND & HART LLP** 

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ATTORNEYS FOR MRC PERMIAN COMPANY

# **CERTIFICATE OF SERVICE**

I hereby certify that on June 20, 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 356262

#### **QUESTIONS**

Operator:	OGRID:
MATADOR PRODUCTION COMPANY	228937
One Lincoln Centre	Action Number:
Dallas, TX 75240	356262
	Action Type:
	[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.	