

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

**APPLICATION OF MRC PRODUCTION COMPANY  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 24864 & 24865**

**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

**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

**OTHER PARTIES**

XTO Energy, Inc.

James P. Parrot  
Miguel A. Suazo  
Beatty & Wozniak, P.C.  
500 Don Gaspar Ave.  
Santa Fe, NM 87505  
(505) 946-2090  
jparrot@bwenergylaw.com  
msuazo@bwenergylaw.com

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

Under these consolidated cases, MRC seeks orders pooling all uncommitted interests in the following proposed horizontal well spacing units underlying Sections 11 and 14, Township 17 South, Range 37 East, NMPM, Lea County, New Mexico:

- Under **Case 24864**, MRC seeks to pool a standard 320-acre, more or less, horizontal well spacing unit in the Bone Spring formation underlying the W2E2 of Sections 11 and 14 to be initially dedicated to the proposed **Monika 1411 Com 133H** well, to be horizontally drilled from a surface location in the SE4 of Section 14, with a first take point in the SW4SE4 (Unit O) of Section 14 and a last take point in the NW4NE4 (Unit B) of Section 11; and
- Under **Case 24865**, MRC seeks to pool a standard 640-acre, more or less, horizontal well spacing unit in the Wolfcamp formation underlying the E2 of Sections 11 and 14 to be initially dedicated to the proposed **Monika 1411 Com 203H** well, to be horizontally drilled from a surface location in the SE4 of Section 14, with a first take point in the SE4SE4 (Unit P) of Section 14 and a last take point in the NE4 NE4 (Unit A) of Section 11. The location of the proposed well 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.

MRC seeks to designate Matador Production Company as the operator of these proposed spacing units. MRC has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject acreage.

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

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Addison Costley, Landman	Affidavit	Approx. 7
Joshua Burrus, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

Since XTO Energy has now withdrawn its objections to these matters, MRC requests that these matters be consolidated for a hearing by self-affirmed statements.

Respectfully submitted,

HOLLAND & HART LLP



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

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, NM 87504  
505-998-4421  
505-983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
pmvance@hollandhart.com

**ATTORNEYS FOR MRC PERMIAN COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 2, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James P. Parrot  
Miguel A. Suazo  
Beatty & Wozniak, P.C.  
500 Don Gaspar Ave.  
Santa Fe, NM 87505  
(505) 946-2090  
[jparrot@bwenergylaw.com](mailto:jparrot@bwenergylaw.com)  
[msuazo@bwenergylaw.com](mailto:msuazo@bwenergylaw.com)

*Attorneys for XTO Energy, Inc.*



---

Michael H. Feldewert

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

QUESTIONS

Action 416737

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 416737
	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.