

**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. 25247-25248, 25250, 25252-25254

MRC'S PRE-HEARING STATEMENT

MRC Permian Company ("MRC") (OGRID No. 229137) submits this pre-hearing statement, as required by the Amended Prehearing Order in these consolidated matters.

APPEARANCES

APPLICANTS

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
agrankin@hollandhart.com
pmvance@hollandhart.com

OTHER PARTIES

Mewbourne Oil Company

ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
505-982-2043
jamesbruc@aol.com

Alpha Energy Partners II, LLC

Darin C. Savage
Andrew D. Schill
William E. Zimsky
ABADIE & SCHILL, PC
214 McKenzie Street
Santa Fe, New Mexico 87501
(970) 385-4401
(970) 385-4901 FAX
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

Marathon Oil Permian, LLC and
ConocoPhillips Company

Elizabeth Ryan
Keri L. Hatley
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
beth.ryan@conocophillips.com
keri.hatley@conocophillips.com

STATEMENT OF THE CASE

These consolidated cases involve the development of the Bone Spring and Wolfcamp formations underlying Sections 27, 28 and 29 of Township 22 South, Range 28 East, NMPM, Eddy County, New Mexico. To efficiently and effectively develop this acreage, MRC seeks to pool spacing units for proposed 3-mile horizontal wells in the Bone Spring and Wolfcamp formation as follows:

- Under **Case 25247**, MRC seeks to pool a standard 480-acre, more or less, horizontal well spacing unit in the Bone Spring formation underlying the N2N2 of Sections 27, 28 and 29 for the proposed **Dick and Donna 2729 Fed Com 121H** well to be horizontally drilled from a surface location in the NW4 of Section 26, with a first take point in the NE4NE4 (Unit A) of Section 27 and a last take point in the NW4NW4 (Unit D) of Section 29.
- Under **Case 25248**, MRC seeks to pool a standard 480-acre, more or less, horizontal well spacing unit in the Bone Spring formation underlying the S2N2 of Sections 27, 28 and 29 for the proposed **Dick and Donna 2729 Fed Com 122H** well to be horizontally drilled from a surface location in the NW4 of Section 26, with a first take point in the SE4NE4 (Unit H) of Section 27 and a last take point in the SW4NW4 (Unit E) of Section 29.

- Under **Case 25250**, MRC seeks to pool a standard 960-acre, more or less, horizontal well spacing unit in the Woflcamp formation underlying the N2 of Sections 27, 28 and 29 for the following proposed wells to be drilled from a surface location in the NW4 of Section 26:
 - **Dick and Donna 2729 Fed Com 201H**, with a first take point in the NE4NE4 (Unit A) of Section 27 and a last take point in the NW4NW4 (Unit D) of Section 29, and
 - **Dick and Donna 2729 Fed Com 202H**, with a first take point in the SE4NE4 (Unit H) of Section 27 and a last take point in the SW4NW4 (Unit E) of Section 29.
- Under **Case 25252**, MRC seeks to pool a standard 480-acre, more or less, horizontal well spacing unit in the Bone Spring formation underlying the N2S2 of Sections 27, 28 and 29 for the proposed **Warrior 2729 Fed Com 123H** well to be horizontally drilled from a surface location in the SW4 of Section 26, with a first take point in the NE4SE4 (Unit I) of Section 27 and a last take point in the NW4SW4 (Unit L) of Section 29.
- Under **Case 25253**, MRC seeks to pool a standard 480-acre, more or less, horizontal well spacing unit in the Bone Spring formation underlying the S2S2 of Sections 27, 28 and 29 for the proposed **Warrior 2729 Fed Com 124H** well to be horizontally drilled from a surface location in the SW4 of Section 26, with a first take point in the SE4SE4 (Unit P) of Section 27 and a last take point in the SW4SW4 (Unit M) of Section 29.
- Under **Case 25254**, MRC seeks to pool a standard 960-acre, more or less, horizontal well spacing unit in the Woflcamp formation underlying the S2 of Sections 27, 28 and 29 for the following proposed wells to be drilled from a surface location in the SW4 of Section 26:
 - **Warrior 2729 Fed Com 203H**, with a first take point in the NE4SE4 (Unit I) of Section 27 and a last take point in the NW4SW4 (Unit L) of Section 29, and
 - **Warrior 2729 Fed Com 204H**, with a first take point in the SE4SE4 (Unit P) of Section 27 and a last take point in the SW4SW4 (Unit M) of Section 29.

In June Mewbourne obtained permission from the Division to file pooling applications for the Bone Spring and Woflcamp formations for its proposed 2.5-mile Doubtfire wells. These applications were assigned Case Nos. 25471-25474 and overlapped the spacing units proposed by MRC in the W2 of Section 29. However, Mewbourne has now dismissed these competing pooling applications and withdrawn its objection to MRC's pooling applications.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Hanna Rhoades, Landman	Self-Affirmed Statement	Approx. 6
Andrew Parker, Geologist	Self-Affirmed Statement	Approx. 7

PROCEDURAL MATTERS

Since the competing Mewbourne Cases 25471-25474 have now been dismissed, MRC intends to present these cases by self-affirmed statements but will have its witnesses available virtually for any questions.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR MRC PERMIAN COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
505-982-2043
jamesbruc@aol.com

Attorney for Mewbourne Oil Company

Darin C. Savage
Andrew D. Schill
William E. Zimsky
ABADIE & SCHILL, PC
214 McKenzie Street
Santa Fe, New Mexico 87501
(970) 385-4401
(970) 385-4901 FAX
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

Attorneys for Alpha Energy Partners II, LLC

Elizabeth Ryan
Keri L. Hatley
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
beth.ryan@conocophillips.com
keri.hatley@conocophillips.com

***Attorneys for Marathon Oil Permian, LLC
and ConocoPhillips Company***



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 487898

QUESTIONS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 487898
	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.