

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

**APPLICATIONS OF MRC TORO, LLC  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 25589, 25590-25593**

**MRC'S CONSOLIDATED PRE-HEARING STATEMENT**

MRC Toro, LLC ("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 Toro, LLC  
("MRC")

**ATTORNEY**

Adam G. Rankin  
Paula M. Vance  
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Post Office Box 2208  
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**APPLICANT'S STATEMENT OF THE CASE**

In these consolidated cases, MRC seeks orders pooling for the referenced acreage, all in Township 25 South, Range 36 East, NMPM, Lea County, New Mexico, in the Wolfcamp (oil) formation (Jal; Wolfcamp, West [33813]) as follows:

- Under **Case No. 25589**, MRC seeks an order pooling all uncommitted interest owners in a standard 320-acre, more or less, horizontal well spacing unit underlying the W/2 E/2 of Sections 17 and 20, and to initially dedicate the above-referenced spacing unit to the proposed **Dogwood 25 36 20 Federal Com 106H** well, to be

drilled from a surface hole location in the SW/4 SE/4 (Unit O) of Section 20 a first take point in the SW/4 SE/4 (Unit O) of Section 20, and a last take point in the NW/4 NE/4 (Unit B) of Section 17; and

- Under **Case No. 25591**, MRC seeks an order pooling all uncommitted interest owners in a standard 320-acre, more or less, horizontal well spacing unit underlying the E/2 E/2 of Sections 17 and 20, and to initially dedicate the above-referenced spacing unit to the proposed **Dogwood 25 36 20 Federal Com 115H** well, to be drilled from a surface hole location in the SW/4 SE/4 (Unit O) of Section 20, a first take point in the SE/4 SE/4 (Unit P) of Section 20 and a last take point in the NE/4 NE/4 (Unit A) of Section 17;

MRC also seeks orders pooling for the referenced acreage, all in Township 25 South, Range 36 East, NMPM, Lea County, New Mexico, in the Bone Spring formation (WC-025 G-08 S253534O; Bone Spring [97088]) as follows:

- Under **Case No. 25590**, MRC seeks an order pooling all uncommitted interest owners in a standard 320-acre, more or less, horizontal well spacing unit underlying the E/2 W/2 of Sections 17 and 20, and to initially dedicate the spacing unit to the proposed **Dogwood 25 36 20 Federal Com 93H** and **Dogwood 25 36 20 Federal Com 113H** wells, both to be drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 20, first take points in the SE/4 SW/4 (Unit N) of Section 20 and last take points in the NE/4 NW/4 (Unit C) of Section 17;
- Under **Case No. 25592**, MRC seeks an order pooling all uncommitted interest owners in a standard 320-acre, more or less, horizontal well spacing unit underlying the W/2 E/2 of Sections 17 and 20, and to initially dedicate the above-referenced

spacing unit to the proposed **Dogwood 25 36 20 Federal Com 124H** well, to be drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 20, a first take point in the SE/4 SE/4 (Unit P) of Section 20 and a last take point in the NW/4 NE/4 (Unit B) of Section 17; and

- Under **Case No. 25593**, MRC seeks an order pooling all uncommitted interest owners in a standard 320-acre, more or less, well spacing unit underlying the E/2 E/2 of Sections 17 and 20, and to initially dedicate the above-referenced spacing unit to the proposed **Dogwood 25 36 20 Federal Com 126H** well, to be drilled from a surface hole location in the SW/4 SE/4 (Unit O) of Section 20, a first take point in the SE/4 SE/4 (Unit P) of Section 20 and a last take point in the NE/4 NE/4 (Unit A) of Section 17.

The completed interval for the wells will comply with statewide setbacks for oil wells. MRC has sought but been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject spacing units.

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

| <b>WITNESS<br/>Name and Expertise</b> | <b>ESTIMATED TIME</b>   | <b>EXHIBITS</b> |
|---------------------------------------|-------------------------|-----------------|
| David Johns, Landman                  | Self-Affirmed Statement | Approx. 4       |
| Blake Herber, Geologist               | Self-Affirmed Statement | Approx. 3       |

#### **PROCEDURAL MATTERS**

MRC requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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

QUESTIONS

Action 511759

QUESTIONS

|                                                                                   |                                                          |
|-----------------------------------------------------------------------------------|----------------------------------------------------------|
| Operator:<br>MATADOR PRODUCTION COMPANY<br>One Lincoln Centre<br>Dallas, TX 75240 | OGRID:<br>228937                                         |
|                                                                                   | Action Number:<br>511759                                 |
|                                                                                   | Action Type:<br>[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. |