

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

**APPLICATIONS OF MRC PERMIAN COMPANY
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 26091-92, 26094-95

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
 (“MRC”)

ATTORNEY

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APPLICANT’S STATEMENT OF THE CASES

Under these consolidated cases, MRC seeks orders pooling for the referenced acreage as follows:

- In **Case No. 26091**, MRC seeks an order pooling all uncommitted interests in a standard 480.44-acre, more or less, horizontal well spacing unit in the Barnett formation [this is a wildcat pool, to be assigned by the Division] underlying Lot 4, the SW/4 NW/4, and W/2 SW/4 (W/2 W/2 equivalent) of irregular Section 4, and

the W/2 W/2 of Sections 9 and 16, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico. Applicant seeks to initially dedicate the above-referenced horizontal spacing unit to the proposed **Roy Turner State Com 811H** well, to be horizontally drilled from a surface location in the Lot 4 (NW/4 NW/4 equivalent) of irregular Section 4, with a first take point in Lot 4 (NW/4 NW/4 equivalent) of irregular Section 4, and a last take point in the SW/4 SW/4 (Unit M) of Section 16.

- In **Case No. 26092**, MRC seeks an order pooling all uncommitted interests in a standard 480.42-acre, more or less, horizontal well spacing unit in the Barnett formation [this is a wildcat pool, to be assigned by the Division] underlying Lot 3, SE/4 NW/4, and E/2 SW/4 (E/2 W/2 equivalent) of irregular Section 4, and the E/2 W/2 of Sections 9 and 16, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico. Applicant seeks to initially dedicate the above-referenced horizontal spacing unit to the proposed **Roy Turner State Com 812H** well, to be horizontally drilled from a surface location in Lot 4 (NW/4 NW/4 equivalent) of irregular Section 4, with a first take point in Lot 3 (NE/4 NW/4 equivalent) of irregular Section 4, and a last take point in the SE/4 SW/4 (Unit N) of Section 16.
- In **Case No. 26094**, MRC seeks an order pooling all uncommitted interests in a standard 480.44-acre, more or less, horizontal well spacing unit in the Woodford formation [this is a wildcat pool, to be assigned by the Division] underlying Lot 4, the SW/4 NW/4, and W/2 SW/4 (W/2 W/2 equivalent) of irregular Section 4, and the W/2 W/2 of Sections 9 and 16, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico. Applicant seeks to initially dedicate the above-

referenced horizontal spacing unit to the proposed **Roy Turner State Com 911H** well, to be horizontally drilled from a surface location in the Lot 4 (NW/4 NW/4 equivalent) of irregular Section 4, with a first take point in Lot 4 (NW/4 NW/4 equivalent) of irregular Section 4, and a last take point in the SW/4 SW/4 (Unit M) of Section 16.

- In **Case No. 26095**, MRC seeks an order pooling all uncommitted interests in a standard 480.42-acre, more or less, horizontal well spacing unit in the the Woodford formation [this is a wildcat pool, to be assigned by the Division] underlying Lot 3, SE/4 NW/4, and E/2 SW/4 (E/2 W/2 equivalent) of irregular Section 4, and the E/2 W/2 of Sections 9 and 16, Township 24 South, Range 36 East, NMPM, Lea County, New Mexico. Applicant seeks to initially dedicate the above-referenced horizontal spacing unit to the proposed **Roy Turner State Com 912H** well, to be horizontally drilled from a surface location in Lot 4 (NW/4 NW/4 equivalent) of irregular Section 4, with a first take point in Lot 3 (NE/4 NW/4 equivalent) of irregular Section 4, and a last take point in the SE/4 SW/4 (Unit N) of Section 16.

The completed interval for the wells will meet the statewide setbacks for oil wells. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject spacing unit.

APPLICANT’S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|---------------------------------------|-------------------------|-----------------|
| David Johns, Landman | Self-Affirmed Statement | Approx. 3 |
| Andrew Parker, 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

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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 580630

QUESTIONS

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| Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240 | OGRID: 228937 |
| | Action Number: 580630 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

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