

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

**APPLICATION OF MEWBOURNE OIL
COMPANY FOR A NON-STANDARD GAS
SPACING AND PRORATION UNIT
AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16234

**APPLICATION OF MEWBOURNE OIL
COMPANY FOR A NON-STANDARD
GAS SPACING AND PRORATION UNIT
AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16235

MARATHON'S PRE-HEARING STATEMENT

Marathon Oil Permian LLC ("Marathon") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company

ATTORNEY

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OPPONENTS

Marathon Oil Permian LLC

ATTORNEY

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STATEMENT OF CASE

In Case No. 16234, Mewbourne Oil Company seeks an order approving a 480- acre non-standard gas spacing and proration unit (project area) in the Wolfcamp formation comprised of the NE/4 of Section 21 and the E/2 of Section 16, Township 24 South, Range 28 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Wolfcamp formation underlying the non-standard unit. The unit will be dedicated to the Creedence 21/16 W0HA State Com. Well No. 1H and the Creedence W0HA State Com. Well No. 2H, horizontal wells with surface locations in the SE/4 NE/4 of Section 21, and bottom hole locations in the NE/4 NE/4 of Section 16.

In Case No. 16235, Mewbourne Oil Company seeks an order approving a 480-acre non-standard gas spacing and proration unit (project area) in the Wolfcamp formation comprised of the NW/4 of Section 21 and the W/2 of Section 16, Township 24 South, Range 28 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Wolfcamp formation underlying the non-standard unit. The unit will be dedicated to the Examiner Hearing June 28, 2018 Docket No. 28-18 Page 17 of 21 Creedence 21/16 W2ED State Com. Well No. 1H and the Creedence W0ED State Com. Well No. 2H, horizontal wells with surface locations in the SW/4 NW/4 of Section 21, and bottom hole locations in the NW/4 NW/4 of Section 16.

Marathon has filed competing applications for this area in Case Nos. 16301, 16302 and 16303 and asks that all of these cases be continued to the July 26, 2018 docket. Marathon opposes Mewbourne's applications in order to protect its correlative rights and to present arguments which promote the prevention of waste.

PROPOSED EVIDENCE

MARATHON:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Chase Rice – Landman	Approx. 40	Approx. 8

Tucker Keren/TBD – Geologist

Approx. 30

Approx. 4

TBD - Engineer

Approx. 20

Approx. 4

PROCEDURAL ISSUES

Marathon requests that Case Nos. 16234, 16235, 16301, 16302 and 16303 be continued to the July 26 docket or to a special docket date.

Respectfully submitted,

**MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.**

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on June 21, 2018:

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