

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

**APPLICATION OF MARATHON OIL PERMIAN LLC TO AMEND ORDER R-14623
TO ADD AN ADDITIONAL WELL, EDDY COUNTY, NEW MEXICO.**

CASE NO. 15958

**APPLICATION OF MARATHON OIL PERMIAN LLC TO AMEND ORDER R-14624
TO ADD AN ADDITIONAL WELL, EDDY COUNTY, NEW MEXICO.**

CASE NO. 15960

MARATHON'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Marathon Oil Permian LLC

ATTORNEY

Jennifer L. Bradfute
Deana M. Bennett
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

INTERESTED PARTY

OXY U.S.A., Inc.

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Jordan L. Kessler
HOLLAND & HART
P.O. Box 2208
Santa Fe, NM 87504
505-998-4421

STATEMENT OF CASE

APPLICANT:

In Case No. 15958, Marathon seeks order from the Division (1) amending Order R-14623 to add an additional well; and (2) amending Order R-14623 to allow for additional time to complete wells. Marathon obtained Order R-14623 in order to facilitate the drilling and completion of the **Sweet Tea State 24-29-31 WA No. 5H and the Sweet Tea 24-29-31 WXY Well No. 3H** wells, which are horizontal wells that will develop the Wolfcamp formation underlying the W/2 of Section 6, Township 25 South, Range 29 East, and SW/4 of Section 31, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. Marathon seeks to amend the order to allow for the drilling of the **Sweet Tea 24 29 31 WD 2H** well within the spacing unit. Marathon also seeks amendment to the order to allow for a one year period between when the well(s) are drilled under that order and required to be completed.

In Case No. 15960, Marathon seeks an order (1) amending Order R-14624 to add an additional well; and (2) amending Order R-14624 to allow for additional time to complete wells. Marathon obtained Order R-14623 in order to facilitate the drilling and completion of the **Sweet Tea State 24-29-31 TB 6H** well, which is a horizontal well that will develop the Bone Spring formation underlying the W/2 W/2 of Section 6, Township 25 South, Range 29 East, and W/2 SW/4 of Section 31, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. Marathon seeks to amend the order to allow for the drilling of the **Sweet Tea 24 29 31 SB 4H** well within the spacing unit approved by the Division, which will be horizontally drilled. Marathon also seeks amendment to the order to allow for a one year period between when the well(s) are drilled under that order and required to be completed.

PROPOSED EVIDENCE

APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: TBD	Approx. 30 minutes	Approx. 8
Geologist: TBD	Approx. 30 minutes	Approx. 6

PROCEDURAL ISSUES

Marathon asks that these matters be consolidated at hearing. Additionally, if there are no objections to these matters, Marathon intends to present them by affidavit.

Respectfully submitted,

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

By: Deana M. Bennett

Jennifer L. Bradfute
Deana M. Bennett
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800

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 November 8, 2018:

Michael H. Feldewert
Adam G. Rankin
Jordan L. Kessler
HOLLAND & HART
P.O. Box 2208
Santa Fe, NM 87504
505-998-4421
mfelderwert@hollandhart.com
arankin@hollandhart.com
jlkessler@hollandhart.com

By: Deana M. Bennett
Jennifer L. Bradfute
Deana M. Bennett
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800