

From: [Deana M. Bennett](#)
To: [Jones, William V. EMNRD](#); [Brooks, David K. EMNRD](#)
Subject: [EXT] Marathon Fremen Cases
Date: Monday, April 15, 2019 12:35:56 PM

Hello,

I am writing to request that the Division prepare a single order for case nos. 16415, 16416, and 16417, rather than three separate orders. These cases are the Fremen cases. No other parties entered an appearance in these cases.

The reason for requesting the single order is as follows. Originally, Marathon had Bone Spring applications and Wolfcamp applications. Marathon decided not to proceed with Bone Springs wells, but instead changed the wells to be Wolfcamp wells. Rather than dismissing the Bone Spring applications, Marathon amended them to reflect Wolfcamp wells, and each amended application requested a spacing unit underlying the S/2 of Sections 7 & 8, Township 24 South, Range 27 East, in Eddy County. In other words, all three applications requested the same spacing unit and proposed to drill only Wolfcamp wells and no Bone Springs wells. As an aside, and as testified to at the hearing, Marathon sent out revised proposal letters and AFEs for all of the wells given the change from Bone Spring to Wolfcamp on November 29, more than 30 days before the January 10 hearing.

Rather than having three orders covering the same unit, Marathon requests a single order that includes all of the proposed wells covering a single unit.

Please let me know if you have any questions.

Much appreciated as always,

Deana



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