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

APPLICATION OF MARATHON OIL PERMIAN LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 16144 (re-opened)

APPLICATION OF MARATHON OIL PERMIAN LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 16145 (re-opened)

APPLICATION OF MARATHON OIL PERMIAN LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 16146 (re-opened)

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

<u>APPLICANT'S ATTORNEY</u>

Marathon Oil Permian, LLC

Deana M. Bennett

Lance D. Hough

MODRALL, SPERLING,

ROEHL, HARRIS & SISK, P.A.

P. O. Box 2168

Albuquerque, New Mexico

87103-2168 (505) 848-1800

OTHER PARTIES ATTORNEY

COG Operating, LLC

Michael Feldewert

Adam G. Rankin

Julia Broggi

Kaitlyn Luck
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, NM 87504
Mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

Bill Carr WCarr@concho.com 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505)780-8000

Devon Energy Production Company, L.P.

Sharon Shaheen Montgomery & Andrews 325 Paseo de Peralta Santa Fe, New Mexico 87501 sshaheen@montand.com

STATEMENT OF CASES

In Case Numbers 16144, 16145, 16146, Marathon seeks to consolidate Division Order Nos. R-20369, R-20370, and R-20371 (Case Nos. 16144, 16145, 16146) into a single order and also to include additional mineral owners in the Wildcat Wolfbone Oil Pool (Pool code 98098) and all other pools hereafter defined within the Wolfbone formation in the E/2 of Section 18 and the NE/4 of Section 19, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

<u>WITNESS</u> <u>ESTIMATED TIME</u> <u>EXHIBITS</u>

Ryan Gyllenband – Landman Approx. 15 minutes Approx. 5

PROCEDURAL ISSUES

Marathon intends to put present these cases by affidavit unless there is objection to Marathon doing so. Marathon also requests that these cases be consolidated for hearing purposes.

Respectfully submitted,

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

Deana M. Bennett

Lance D. Hough

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

<u>Deana.bennett@modrall.com</u>

Lance.Hough@modrall.com

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 August 28, 2019:

Michael Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn Luck
P.O. Box 2208
Santa Fe, NM 87504
Mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

Bill Carr WCarr@concho.com 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505)780-8000

Sharon Shaheen 325 Paseo de Peralta Santa Fe, New Mexico 87501 sshaheen@montand.com

By: Wella M. Bennett

Deana M. Bennett

Lance D. Hough Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

<u>Deana.Bennett@modrall.com</u>

Lance.Hough@modrall.com