RECEIVED OCD

2018 JAN -4 P 4: 2b

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

APPLICATION OF MARATHON OIL PERMIAN LLC FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT, NON-STANDARD LOCATIONS, AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NO. 15907

PRE-HEARING STATEMENT

Robert E. Landreth and Advance Energy Partners LLC, provisionally provide this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

ROBERT E. LANDRETH AND ADVANCE ENERGY PARTNERS LLC

ROBERT E. LANDRETH AND ADVANCE ENERGY PARTNERS LLC'S

ATTORNEY

J. Scott Hall, Esq.

MONTGOMERY & ANDREWS, P.A.

P.O. Box 2307

Santa Fe, NM 87504-2307

Tele (505) 982-3873 shall@montand.com

APPLICANT

APPLICANT'S ATTORNEY

MARATHON OIL PERMIAN LLC

Earl E. DeBrine, Jr. Jennifer Bradfute

Modrall, Sperling, Roehl, Harris & Sisk,

P.A.

Post Office Box 2168 Albuquerque, NM 87103

ilb@modrall.com

earl.debrine@modrall.com

OTHER PARTY(IES)

OTHER PARTY(IES) ATTORNEY

MRC PERMIAN COMPANY

Jordan L. Kessler Adam G. Rankin Holland & Hart LLP Post Office Box 2208 Santa Fe, NM 87504-2208 mfeldewert@hollandhart.com jlkessler@hollandhart.com agrankin@hollandhart.com

EOG RESOURCES, INC.

Michael H. Feldewert
Jordan L. Kessler
Adam G. Rankin
Holland & Hart LLP
Post Office Box 2208
Santa Fe, NM 87504-2208
mfeldewert@hollandhart.com
ilkessler@hollandhart.com
agrankin@hollandhart.com

STATEMENT OF THE CASE

Applicant Marathon Oil Permian LLC seeks an order (1) approving a non-standard 160-acre spacing and proration unit in the Bone Spring formation, comprised of the E/2 E/2 of Section 26, Township 24 South, Range 34 East, NMPM, Lea County, New Mexico; (2) approving non-standard locations; and (3) pooling all uncommitted mineral interests in the Bone Spring formation underlying the non-standard spacing and proration unit.

PROPOSED EVIDENCE

OTHER PARTY: ROBERT E. LANDRETH AND ADVANCE ENERGY PARTNERS LLC

WITNESSES:

EST. TIME

EXHIBITS

Mr. Landreth and Advance Energy Partners do not plan on presenting witness testimony but reserve the right to do so.

APPLICANT: MARATHON OIL PERMIAN LLC

<u>WITNESSES</u>: <u>EST. TIME</u> <u>EXHIBITS</u>

Ryan Gyllenband – Landman Approx. 20 min. Approx. 6

Ethan Perry – Geologist Approx. 15 min. Approx. 4

Lane Neal – Reservoir Engineer Approx. 20 min. Approx. 5

OTHER PARTY(IES): MRC PERMIAN COMPANY

<u>WITNESSES</u>: <u>EXT. TIME</u> <u>EXHIBITS</u>

OTHER PARTY(IES): EOG RESOURCES, INC.

<u>WITNESSES</u>: <u>EXT. TIME</u> <u>EXHIBITS</u>

Charles Moran, Landman Approx. 15 min. Approx. 5

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

J. Scott Hall

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

shall@montand.com

Attorneys for Robert E. Landreth and Advance Energy Partners LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on January 4, 2018:

Earl E. DeBrine, Jr.
Jennifer Bradfute
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, NM 87103
<u>ilb@modrall.com</u>
<u>earl.debrine@modrall.com</u>

Attorneys for Applicant

Jordan L. Kessler
Adam G. Rankin
Holland & Hart LLP
Post Office Box 2208
Santa Fe, NM 87504-2208
mfeldewert@hollandhart.com
ilkessler@hollandhart.com
agrankin@hollandhart.com

Attorneys for MRC Permian Company

Michael H. Feldewert
Jordan L. Kessler
Adam G. Rankin
Holland & Hart LLP
Post Office Box 2208
Santa Fe, NM 87504-2208
mfeldewert@hollandhart.com
ilkessler@hollandhart.com
agrankin@hollandhart.com

Attorneys for EOG Resources, Inc.

7.1 wy yak

J. Scott Hall